

Approved:

ELIE HONIG / JASON P.W. HALPERIN
Assistant United States Attorneys

Before:

HON. DOUGLAS F. EATON
United States Magistrate Judge
Southern District of New York

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UNITED STATES OF AMERICA :

- v. - :

SEALED AMENDED COMPLAINT

KYO HWA ADLER, :
SUN IM AN, : 06 Mag. 1138
JI HYUN BANG, :
AEOK BOYDSTON, : Violations of Title 18,
a/k/a "Big Sister Lillie," : United States Code, Section
UN SUN BROWN, : 371
KIM CHONG, :
a/k/a "Big Sister Lora," : COUNTY OF OFFENSE:
YONG CHONG, : New York, et al.
a/k/a "Ra Ra," :
SUN DANEMAN, :
CHONG GIROUARD, :
CHUN GRANDT, :
a/k/a "Texas Imo," :
MI SUN HAYES, :
AN SOON KIM, :
HYANG RAN KIM, :
a/k/a "Tina," :
HYEA KIM, :
a/k/a "Patty Kim," :
KYUNG HWA KIM, :
YONG HUI KIM, :
KYONG HEE LEE, :
JUNG LIM, :
a/k/a "Big Sister Miko," :
KUM OK LOWERY, :
MYONG MOON, :
a/k/a "Debbie," :
TAE YOUNG OH, :
EUN JA PARK, :
MI JA PARK, :
SUNG SU PLOURDE, :
SENG HEE RYAN, :
MYONG SA, :
JAE SHIM, :
HYO WON SMITH, :

a/k/a "Niko,"
TAE NAM THOMPSON,
CHONG WEISHAAPT,

Defendants.

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SOUTHERN DISTRICT OF NEW YORK, ss.:

MICHAEL P. CONLON, being duly sworn, deposes and says that he is a Special Agent with United States Immigration and Customs Enforcement ("ICE"), and he charges as follows:

COUNT ONE

1. From at least in or about February 2006, up to and including in or about May 2006, in the Southern District of New York and elsewhere, KYO HWA ADLER, SUN IM AN, JI HYUN BANG, AEOK BOYDSTON, a/k/a "Big Sister Lillie," UN SUN BROWN, KIM CHONG, a/k/a "Big Sister Lora," YONG CHONG, a/k/a "Ra Ra," SUN DANEMAN, CHONG GIROUARD, CHUN GRANDT, a/k/a "Texas Imo," MI SUN HAYES, AN SOON KIM, HYANG RAN KIM, a/k/a "Tina," HYEAE KIM, a/k/a "Patty Kim," KYUNG HWA KIM, YONG HUI KIM, KYONG HEE LEE, JUNG LIM, a/k/a "Big Sister Miko," KUM OK LOWERY, MYONG MOON, a/k/a "Debbie," TAE YOUNG OH, EUN JA PARK, MI JA PARK, SUNG SU PLOURDE, SENG HEE RYAN, MYONG SA, JAE SHIM, HYO WON SMITH, a/k/a "Niko," TAE NAM THOMPSON, CHONG WEISHAAPT, the defendants, and others known and unknown, unlawfully, wilfully, and knowingly did combine, conspire, confederate, and agree together and with each other to commit offenses against the United States, to wit, to violate Section 1590 of Title 18, United States Code; Section 2421 of Title 18, United States Code; Section 2422(a) of Title 18, United States Code; and Section 1324(a)(1)(A)(ii) of Title 8, United States Code.

2. It was a part and an object of the conspiracy that KYO HWA ADLER, SUN IM AN, JI HYUN BANG, AEOK BOYDSTON, a/k/a "Big Sister Lillie," UN SUN BROWN, KIM CHONG, a/k/a "Big Sister Lora," YONG CHONG, a/k/a "Ra Ra," SUN DANEMAN, CHONG GIROUARD, CHUN GRANDT, a/k/a "Texas Imo," MI SUN HAYES, AN SOON KIM, HYANG RAN KIM, a/k/a "Tina," HYEAE KIM, a/k/a "Patty Kim," KYUNG HWA KIM, YONG HUI KIM, KYONG HEE LEE, JUNG LIM, a/k/a "Big Sister Miko," KUM OK LOWERY, MYONG MOON, a/k/a "Debbie," TAE YOUNG OH, EUN JA PARK, MI JA PARK, SUNG SU PLOURDE, SENG HEE RYAN, MYONG SA, JAE SHIM, HYO WON SMITH, a/k/a "Niko," TAE NAM THOMPSON, CHONG WEISHAAPT, the defendants, and others known and unknown, unlawfully, wilfully, and knowingly would and did recruit,

harbor, transport, provide, and obtain by any means persons for labor and services by threats of harm to, and physical restraint against, those persons; by means of a scheme, plan, and pattern intended to cause the persons to believe that, if the persons did not perform such labor and services, those persons or another person would suffer serious harm and physical restraint; and by means of the abuse and threatened abuse of law and the legal process, in violation of Title 18, United States Code, Section 1590.

3. It was further a part and an object of the conspiracy that KYO HWA ADLER, SUN IM AN, JI HYUN BANG, AEOK BOYDSTON, a/k/a "Big Sister Lillie," UN SUN BROWN, KIM CHONG, a/k/a "Big Sister Lora," YONG CHONG, a/k/a "Ra Ra," SUN DANEMAN, CHONG GIROUARD, CHUN GRANDT, a/k/a "Texas Imo," MI SUN HAYES, AN SOON KIM, HYANG RAN KIM, a/k/a "Tina," HYEAE KIM, a/k/a "Patty Kim," KYUNG HWA KIM, YONG HUI KIM, KYONG HEE LEE, JUNG LIM, a/k/a "Big Sister Miko," KUM OK LOWERY, MYONG MOON, a/k/a "Debbie," TAE YOUNG OH, EUN JA PARK, MI JA PARK, SUNG SU PLOURDE, SENG HEE RYAN, MYONG SA, JAE SHIM, HYO WON SMITH, a/k/a "Niko," TAE NAM THOMPSON, CHONG WEISHAUP, the defendants, and others known and unknown, unlawfully, wilfully, and knowingly would and did transport individuals in interstate and foreign commerce, with intent that such individuals engage in prostitution and in any sexual activity for which a person can be charged with a criminal offense, in violation of Title 18, United States Code, Section 2421.

4. It was further a part and an object of the conspiracy that KYO HWA ADLER, SUN IM AN, JI HYUN BANG, AEOK BOYDSTON, a/k/a "Big Sister Lillie," UN SUN BROWN, KIM CHONG, a/k/a "Big Sister Lora," YONG CHONG, a/k/a "Ra Ra," SUN DANEMAN, CHONG GIROUARD, CHUN GRANDT, a/k/a "Texas Imo," MI SUN HAYES, AN SOON KIM, HYANG RAN KIM, a/k/a "Tina," HYEAE KIM, a/k/a "Patty Kim," KYUNG HWA KIM, YONG HUI KIM, KYONG HEE LEE, JUNG LIM, a/k/a "Big Sister Miko," KUM OK LOWERY, MYONG MOON, a/k/a "Debbie," TAE YOUNG OH, EUN JA PARK, MI JA PARK, SUNG SU PLOURDE, SENG HEE RYAN, MYONG SA, JAE SHIM, HYO WON SMITH, a/k/a "Niko," TAE NAM THOMPSON, CHONG WEISHAUP, the defendants, and others known and unknown, unlawfully, wilfully, and knowingly would and did persuade, induce, entice, and coerce individuals to travel in interstate and foreign commerce to engage in prostitution and in any sexual activity for which any person can be charged with a criminal offense, in violation of Title 18, United States Code, Section 2422(a).

5. It was further a part and an object of the conspiracy that KYO HWA ADLER, SUN IM AN, JI HYUN BANG, AEOK BOYDSTON, a/k/a

"Big Sister Lillie," UN SUN BROWN, KIM CHONG, a/k/a "Big Sister Lora," YONG CHONG, a/k/a "Ra Ra," SUN DANEMAN, CHONG GIROUARD, CHUN GRANDT, a/k/a "Texas Imo," MI SUN HAYES, AN SOON KIM, HYANG RAN KIM, a/k/a "Tina," HYEAE KIM, a/k/a "Patty Kim," KYUNG HWA KIM, YONG HUI KIM, KYONG HEE LEE, JUNG LIM, a/k/a "Big Sister Miko," KUM OK LOWERY, MYONG MOON, a/k/a "Debbie," TAE YOUNG OH, EUN JA PARK, MI JA PARK, SUNG SU PLOURDE, SENG HEE RYAN, MYONG SA, JAE SHIM, HYO WON SMITH, a/k/a "Niko," TAE NAM THOMPSON, CHONG WEISHAUP, the defendants, and others known and unknown, unlawfully, wilfully, and knowing and in reckless disregard of the fact that an alien has come to, entered, and remains in the United States in violation of law, would and did transport and move, and attempt to transport and move such alien within the United States by means of transportation and otherwise, in violation of Title 8, United States Code, Section 1324(a)(1)(A)(ii).

Overt Acts

6. In furtherance of the conspiracy and to effect the illegal objects thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. On or about April 13, 2006, a co-conspirator not named as a defendant herein ("CC-1") drove a woman to a prostitution business in Manhattan.

b. On or about February 18, 2006, CC-1 drove through Manhattan and the Bronx in the course of delivering a woman to a prostitution business located in Washington, DC.

c. On or about February 25, 2006, CC-1 drove through Manhattan and the Bronx in the course of delivering a woman to a prostitution business located in Washington, DC.

(Title 18, United States Code, Section 371)

The basis for my knowledge and the foregoing charge is, in part, as follows:

7. I have been a Special Agent with ICE for approximately three years. In my capacity as a Special Agent, I have participated in numerous investigations of human trafficking, alien smuggling, and interstate prostitution, among other crimes.

8. Throughout this Complaint, where I assert that a statement was made, I was not personally the individual to whom

the statement was made, unless I specifically so state. Rather, the information was provided by other law enforcement officers (who may have had either direct or hearsay knowledge of the statement) to whom I have spoken or whose reports I have read and reviewed. Such statements are among many statements made by others and are set forth only in substance and in pertinent part, unless otherwise indicated. Likewise, the information resulting from surveillance, except where otherwise indicated, does not set forth my personal observations, but rather has been provided directly or indirectly through law enforcement officers who observed the events that have been set forth below. Furthermore, because this Complaint is submitted for the limited purpose of establishing probable cause, it does not include each and every fact learned during my investigation. Where actions, statements, or conversations of others are related herein, they are related in substance and in part, unless otherwise indicated.

Overview of the Investigation and Operation of the Trafficking Enterprise

9. In or about May 2005, ICE and the FBI began an investigation of two brothel owners located in Queens, New York, which resulted in the arrests of the two brothel owners and two NYPD officers who had been accepting bribes from the brothel owners. Building on that investigation, ICE and other law enforcement agencies, including the Federal Bureau of Investigation ("FBI"), became involved in a wide-ranging investigation of the illegal smuggling of Korean women into the United States and the subsequent trafficking of those women within a network of prostitution businesses operating throughout the Northeastern United States. During this investigation, other agents and I have engaged in investigative techniques including but not limited to the following: court-authorized interception of telephonic communications, discussed in more detail herein; conversations with and review of files pertaining to confidential informants and cooperating witnesses; conversations with other agents and review of files relating to prior law enforcement investigations of trafficking enterprises and prostitution businesses; statements made by victims of sex trafficking enterprises; and review of immigration files and criminal history records of various defendants. Based on my involvement in this investigation, I have learned that this and other criminal sex trafficking enterprises generally operate as follows.

10. First, recruiters in Korea and the United States identify Korean women who want to come to the United States, typically to make money to support their families in Korea. The

recruiters then arrange for the transportation of the women from Korea to North America. In some cases, the recruiters provide the women with false immigration documents, including passports and visas, or with false underlying documents enabling the women to obtain United States passports or visas. In other instances, the women are taken into the custody of other handlers in Canada or Mexico and then smuggled into the United States.

11. By the time the women have been taken into the United States, the women owe the recruiters and other members of the criminal organization a large debt, usually in the tens of thousands of dollars. Once in the United States, the women are typically placed under the supervision and custody of a network of transporters who drive the women to any of several prostitution businesses operating throughout the Northeastern United States, including in the New York City, Washington DC, and Philadelphia metropolitan areas. In many cases, the prostitution businesses formally purport to be legal enterprises such as massage parlors or health spas, but in fact generate the vast majority of their revenue through illegal prostitution.

12. Once the women are delivered to a given prostitution house, they are placed under the supervision and custody of the prostitution house owner or manager, typically an older Korean woman. The owner or manager of the prostitution business often takes from the women all identification and travel documents, including passports, to restrict the ability of the women to leave.

13. The women then begin working in the prostitution houses as prostitutes, typically with their earnings credited against their outstanding debts to the members of the criminal organization. The women are in some instances told or led to believe that, if they leave the prostitution business before paying off their debts, they will suffer a range of harms, including but not limited to being turned in to United States law enforcement or immigration authorities. The women are also sometimes threatened with harm to their families in Korea, should they leave the prostitution business before paying off their debt.

14. Once the women enter the network of prostitution businesses, they are traded and exchanged between and among the various prostitution house owners and managers. Typically, an owner or manager needs a certain number of women to meet customer demand. Owners and managers also seek women who possess certain physical attributes, including, for example, younger women, taller women, or women with large breasts. Owners and managers

usually want a high level of turnover among women, to offer customers a variety of choices. When an owner or manager needs a new woman, the owner or manager usually places a call to any of a number of drivers or transporters. The drivers, in turn, locate a woman who fits the managers' need, and then arrange for the transportation of the women to the new prostitution house. As a result, the women are usually transported frequently among the various prostitution businesses, sometimes as often as several times per month. The prostitution business owners and managers typically keep a large portion of the money paid by customers, and credit the rest against the debts owed by the women to the ring members. In many cases, the owners and managers make tens of thousands of dollars in profits every month. The women continue to be exchanged by and among the network of prostitution businesses at least until they have worked off their original debts to the members of the criminal organization.

Intercepted Conversations of CC-1

15. In connection with this investigation, in February 2006, a United States District Judge in the Eastern District of New York authorized federal agents to monitor and intercept calls made to and from a cellular telephone ("CELLPHONE 1") owned by a co-conspirator not named herein ("CC-1"). The interception of CC-1's phone calls began in February 2006 and continued, pursuant to court order, until May 2006. In total, other agents and I intercepted thousands of calls to and from CC-1 over CELLPHONE 1, many of which related directly to the operation of the trafficking enterprise described in this Complaint. The sum and substance of particular calls is set forth for each defendant in this Complaint, below.¹ Based on the intercepted calls as a whole, as well as law enforcement surveillance of CC-1, I have learned that CC-1 is a driver who transports Korean women working as prostitutes throughout the Northeastern United States. Typically, a prostitution business owner or manager would call CC-1 to request a new woman, or a particular kind of woman, to work at a specific prostitution business. CC-1, in turn, would find a woman to meet the owner's demand and then would drive the woman to that owner's prostitution business. CC-1 also acted as

¹ The conversations on these telephone calls were primarily in Korean. I have reviewed summary translations of many of these calls. Where these calls are set forth in this complaint, they are set forth only in substance and in part, and are subject to change upon further review. Further, some of the calls are in code, and the summaries set forth below include, where necessary, my interpretation of that code.

a conduit for communications between and among the prostitution business owners and managers. For example, CC-1 had numerous conversations with owners and managers about the immigration status of various women; about the needs and demands of other prostitution businesses; and about law enforcement actions taken at other prostitution businesses.

16. Based on my investigation, I have learned that CC-1 transported women throughout the Northeastern United States, including the New York City, Washington DC and Philadelphia metropolitan areas. In particular, I have learned based on the intercepted phone calls to and from CELLPHONE 1, as well as bridge and highway toll records, that CC-1 provided women to prostitution businesses located in Manhattan and elsewhere. CC-1 also drove through Manhattan and the Bronx on numerous occasions while transporting women to and from various prostitution houses.

The Owners and Managers of Specific Prostitution Businesses

17. Based on the investigation described in this Complaint, I have identified numerous individuals who are either owners or managers of various prostitution businesses in the Northeastern United States. Those owners and managers are discussed with more specificity in the following paragraphs.

New York-Area Prostitution Businesses

Unnamed Prostitution Business, 26th Street between 6th Avenue and Broadway, New York, New York

Unnamed Prostitution Business, 221 59th Street, New York, New York

Defendant KYO HWA ADLER

18. I have reviewed summary translations of at least ten phone calls between KYO HWA ADLER, the defendant, and CC-1, who was then utilizing CELLPHONE 1, from on or about February 27, 2006, up to and including on or about April 30, 2006. During all of these calls, ADLER used the phone assigned number (646) 244-8766, which is a number subscribed to another person. Based on Lexis-Nexis database records and ICE database records, I know that ADLER and the other person have shared an address since 1989, and that ADLER has made bank deposits on behalf of the other person since 1988. Also during the calls with CC-1, ADLER confirmed that the address of her prostitution business was 221 59th Street.

19. ADLER and CC-1 had several calls about CC-1 supplying women to ADLER's business. For example, on or about February 27, 2006, ADLER told CC-1 she needed a girl with large breasts²; CC-1 responded that he had a girl who just had breast augmentation, who CC-1 would bring to ADLER shortly. On or about April 12, 2006 CC-1 told ADLER he had a 52 year-old woman who CC-1 would bring to ADLER the next day. ADLER confirmed the address, 221 59th Street, with CC-1. And on or about April 30, 2006, ADLER asked CC-1 for a girl with large breasts. CC-1 said he would try to find a girl for ADLER.

20. I have reviewed ADLER's criminal history record, which shows that ADLER was arrested for prostitution and bribery of a public servant, and was then convicted of attempted bribery of a public servant, in Queens County Criminal Court in or about June 2000. ADLER also was convicted of promoting prostitution in New York state court in or about December 2003.

Defendant AEOK BOYDSTON

21. I have reviewed summary translations of at least nine phone calls between AEOK BOYDSTON, the defendant, and CC-1, who was then utilizing CELLPHONE 1, from on or about March 30, 2006, up to and including on or about April 27, 2006. During all of these calls, BOYDSTON used the phone assigned number (917) 743-1757, which is a number subscribed to BOYDSTON. During the calls, BOYDSTON identified herself as "Big Sister Lillie." BOYDSTON also described the physical location of her prostitution business during the calls. Other agents have conducted surveillance of BOYDSTON at her residence, and have positively identified her based on a photograph obtained from her immigration file.

22. On or about April 3, 2006, BOYDSTON told CC-1 she needed two girls for her place on 26th Street between 6th Avenue and Broadway. CC-1 said he would look for girls and call back. On or about April 4, 2006, CC-1 told BOYDSTON he could not find any girls. BOYDSTON said she would accept an older woman because she had no girls and needed to open. CC-1 said he would try again to find a girl for BOYDSTON. Later that day, BOYDSTON again called CC-1, and told CC-1 she needed girls desperately. CC-1 told BOYDSTON that girls are reluctant to work at BOYDSTON's

² The references in this Complaint to physical attributes are evidence that the conspirators were discussing the prostitution business. In addition, the term "girl" is a translation of the Korean word used in the conversation.

location, and that CC-1 will keep trying to find a girl for BOYDSTON.

Unknown Prostitution Business Locations, New York Area

Defendant KYONG HEE LEE

23. I have reviewed summary translations of at least three phone calls between KYONG HEE LEE, the defendant, and CC-1, who was then utilizing CELLPHONE 1, from on or about April 26, 2006, up to and including on or about April 27, 2006. During all of these calls, LEE used the phone assigned number (718) 986-0128, which is a number subscribed to another person. Based on the subscriber information for that phone, I know that the other person resides at a specific address in Queens, New York; based on a review of LEE's immigration file and financial records including suspicious activity reports prepared by banks, I know that LEE resides at the same address in Queens. I also have reviewed an immigration file, which includes documents showing that the other person filed a petition for a green card on behalf of LEE, who the other person listed as a relative.

24. On April 26, 2006, LEE told CC-1 she needed a girl to work for two or three weeks. CC-1 agreed to find a girl for LEE. On April 27, 2006, LEE told CC-1 she needed a young girl, and that the girl did not need to have identification. Later that day, CC-1 said he would try to find a girl for LEE.

Defendant AN SOON KIM

25. I have reviewed summary translations of at least 10 phone calls between AN SOON KIM, the defendant, and CC-1, who was then utilizing CELLPHONE 1, from on or about February 18, 2006, up to and including on or about May 19, 2006. During all of these calls, KIM used the phone assigned number (718) 309-1949, which is a number subscribed to KIM. During several of the calls with CC-1, KIM identified herself as "Big Sister Kim."

26. On or about February 18, 2006, CC-1 told KIM he would drop an envelope at her location, and, the next day, KIM told CC-1 to come by to pick something up. On March 25, 2006, KIM told CC-1 she was calling from Connecticut and needed girls; CC-1 said he would check. The next day, CC-1 told KIM he found a girl, but KIM said she already had gotten a girl. Again in April 2006, KIM and CC-1 had several discussions about CC-1 providing girls to KIM. Kim and CC-1 also discussed the fact that KIM should keep the envelopes, and, on one occasion, KIM told CC-1 to pick up some money in Washington, DC.

Connecticut-Area Prostitution Businesses

"Bally Sauna," 197 Main Street, Stamford, CT

Defendant JI HYUN BANG

27. I have reviewed summary translations of at least 14 phone calls between JI HYUN BANG, the defendant, and CC-1, who was then utilizing CELLPHONE 1, from on or about March 18, 2006, up to and including on or about May 12, 2006. BANG used at least two different cellphones to make those calls. First, in March 2006, BANG made several of the calls from the phone assigned number (718) 873-6975. During those calls, BANG identified herself as "Ji Hyun," and stated to CC-1 that she had just opened her business, "Bally Sauna," in Connecticut. BANG also made several calls from the phone assigned number (646) 463-1111, which is subscribed to another person. Based on Lexis-Nexis database records, I know that the other person and BANG formerly shared an address. During her calls with CC-1, BANG stated the name of her business was "Bally." I have obtained a photograph of BANG from her immigration file.

28. On or about March 18, 2006, BANG told CC-1 she needed a girl with big breasts, and CC-1 said he would look for a girl for BANG. During two calls on March 25, 2006, BANG called CC-1 to confirm that CC-1 would be bringing girls and to set a time for the delivery. CC-1 later called BANG back and stated that CC-1 could not get a girl. BANG then stated that her business was very busy, and that BANG needed a girl. BANG then told CC-1 she would call somebody else to provide a girl.

"Crystal Spa," 523 West Avenue, Norwalk, CT

Defendant HYEAE KIM

29. I have reviewed summary translations of at least eight phone calls between HYEAE KIM, the defendant, and CC-1, who was then utilizing CELLPHONE 1, from on or about February 27, 2006, up to and including on or about March 2, 2006. During all of these calls, KIM used the phone assigned number (201) 456-1743, which is subscribed to KIM. During a series of calls on or about February 27, 2006, KIM called CC-1 on CELLPHONE 1 and introduced herself as "Patty Kim" from "Crystal Spa" in Norwalk, Connecticut. KIM gave her address as 524 West Avenue in Norwalk, Connecticut. KIM also stated to CC-1 that she runs and has run other businesses in New Jersey and in Connecticut. I have obtained a photograph of KIM from her immigration file.

30. On or about February 27, 2006, KIM requested a girl from CC-1 as soon as possible. CC-1 then told Kim that CC-1 would be arriving later that night with a girl, and KIM agreed to pay \$150 in commission. Kim stated she was having trouble finding girls in Connecticut and needed to change girls every few weeks to keep her customers happy. KIM later called CC-1 and asked if CC-1's brother would pick up a box of condoms for her. KIM then called CC-1 and gave her address as 524 West Avenue in Norwalk, Connecticut. CC-1 later called KIM back and stated that the girl should arrive shortly. KIM thereafter called CC-1 to thank CC-1 and to order another girl.

31. I have reviewed KIM's criminal history record, which shows that KIM was convicted in or about October 1995 of prostitution, in New York County Criminal Court.

"Liberty," Norwalk, Connecticut

Defendant MYONG SA

32. I have reviewed summary translations of at least three phone calls between MYONG SA, the defendant, and CC-1, who was then utilizing CELLPHONE 1, on or about April 10, 2006. During all of these calls, SA used the phone assigned number (914) 804-4754, which is a number subscribed to another person. I have reviewed Lexis-Nexis database records which show that SA resides with the other person. During one of the calls, SA stated to CC-1 that she was calling using her husband's phone because her phone was confiscated by law enforcement. SA also stated to CC-1 during a call that she worked at "Liberty," which recently had been raided by law enforcement. I have reviewed a police report by the Norwalk, Connecticut police, which shows that in or about March 2006, SA was arrested, and her phone was seized, at Liberty Spa. I have obtained a photograph of SA from her immigration file.

33. On April 10, 2006, SA told CC-1 she was a former manager of another business and had now moved to "Liberty" in Connecticut. CC-1 said her new business had been raided by law enforcement, but she had hired a lawyer to make her business appear legitimate. SA told CC-1 she needed CC-1 to find two girls and a manager for SA. CC-1 responded that same day that he had two girls; CC-1 further stated that even though he was unsure if the girls were legal, he could place the girls with SA later in the week. SA responded that she preferred girls who had entered the country legally, even if their stays had expired. CC-1 said he would call SA back.

"Four Seasons," 985 Main Street, Stamford, Connecticut

Defendant KIM CHONG

34. I have reviewed summary translations of at least seven phone calls between KIM CHONG, the defendant, and CC-1, who was then utilizing CELLPHONE 1, from on or about February 16, 2006, up to and including on or about April 14, 2006. During all of these calls, CHONG used the phone assigned number (203) 561-7107, which is a number subscribed to CHONG. CHONG identified herself as "Lora" or "Big Sister Lora," and CHONG stated during several of the calls that she was calling from "Four Seasons." Further, I have reviewed Lexis-Nexis database records relating to a business called "Four Seasons LLC" at 985 Main Street in Stamford, Connecticut. Those records list CHONG as the owner of the business. I have obtained a photograph of CHONG from her immigration file.

35. During two calls in February 2006, CHONG told CC-1 that she was calling from "Four Seasons," and that she needs younger girls, because she has all older girls and about 50 to 60 customers. CC-1 agreed to look for girls for CHONG. Later, on or about April 2, 2006, CC-1 recommended a new employee to CHONG. CHONG stated to CC-1 that she was in the process of negotiating a business agreement with a local detective about voluntarily closing, and then re-opening, her business. CHONG stated that she was happy to be doing business with police protection. CHONG asked CC-1 to provide girls when CHONG re-opened, and CC-1 agreed. On or about April 8, 2006, CHONG and CC-1 discussed another location that was raided by law enforcement; CC-1 confirmed that another location was raided and people were arrested.

36. I have reviewed CHONG's criminal history record, which shows that CHONG pled no contest in July 1999 to a charge of prostitution, in Dallas, Texas.

Defendant SUNG SU PLOURDE

37. I have reviewed summary translations of at least seven phone calls between SUNG SU PLOURDE, the defendant, and CC-1, who was then utilizing CELLPHONE 1, from on or about May 15, 2006, up to and including on or about May 18, 2006. During all of these calls, PLOURDE used the phone assigned number (302) 690-1160, which is a number subscribed to PLOURDE. During those calls, PLOURDE repeatedly identified herself as a manager of Four Seasons. I have obtained a photograph of PLOURDE from her immigration file.

38. On or about May 15, 2006, PLOURDE identified herself as a manager of Four Seasons in Connecticut, and requested that CC-1 refer a girl to another business. CC-1 agreed to try to find a girl on PLOURDE's behalf for the other business. Also, on or about May 17, 2006, CC-1 told PLOURDE he would come to her business after dropping off a girl at another business.

"Ginja Spa," 207 Atlantic Street, Stamford, Connecticut and
"Hong Kong," 133-15 35th Avenue, Flushing, New York

Defendants HYO WON SMITH and JAE SHIM

39. I have reviewed summary translations of at least 10 phone calls between HYO WON SMITH and JAE SHIM, the defendants, and CC-1, who was then utilizing CELLPHONE 1, from on or about February 15, 2006, up to and including on or about April 3, 2006. During all of these calls, SMITH used the phone assigned number (917) 291-8529, which is a number subscribed to SMITH. During these phone calls, SMITH also provided CC-1 with an alternative phone number of (203) 324-9965, which is subscribed to Ginja Spa at 207 Atlantic Street in Stamford, Connecticut. During those calls, SMITH identified herself as "Hyo Won" or "Niko," and stated that she is calling from "Ginja." I have obtained a photograph of SMITH from her immigration file.

40. Also during these phone calls, SHIM provided CC-1 with an alternative phone number of (347) 256-5883, which is subscribed to SHIM. During those calls, SHIM identified herself as "JAE SHIM," and SHIM told CC-1 she owned "Hong Kong" in Flushing, New York.

41. During several calls, SMITH asked CC-1 to provide her with girls to work at her business, and CC-1 agreed. On or about April 3, 2006, SMITH also introduced CC-1 over the phone to SHIM, who SMITH said was a friend who ran another business that has 40 to 50 customers per day, and has 6 or 7 girls, and is looking for more girls. SHIM then identified herself to CC-1 as "JAE SHIM," and gave CC-1 her phone number of (347) 256-5883. Later that day, April 3, 2006, SMITH, SHIM, and CC-1 had further discussions about CC-1 providing SHIM with girls.

42. I have reviewed SMITH's criminal record, which shows that, in August 1999, SMITH pled "no contest" to a charge of soliciting sodomy in Georgia.

43. I have reviewed SHIM's criminal record, which shows that, in or about April 1993, SHIM was convicted in DeKalb County, Georgia of keeping or living in a prostitution house.

Also, in or about September 2005, SHIM was convicted of prostitution in Howard County, Maryland.

Defendant CHONG WEISHAAPT

44. I have reviewed summary translations of at least 31 phone calls between CHONG WEISHAAPT, the defendant, and CC-1, who was then utilizing CELLPHONE 1, from on or about February 15, 2006, up to and including on or about May 13, 2006. During all of these calls, WEISHAAPT used the phone assigned number (469) 585-0576, which is a number subscribed to WEISHAAPT.

45. During several of those calls, WEISHAAPT asked CC-1 to help her find employment as a manager at various brothels around the Northeast United States; CC-1 said he would try to find WEISHAAPT work at Ginja Spa in Connecticut. On several occasions, WEISHAAPT asked CC-1 to provide her with girls. For example, on or about March 1, 2006, WEISHAAPT requested that CC-1 deliver a tall girl with big breasts. On or about April 2, 2006, WEISHAAPT told CC-1 she had five girls, but one was sick, so she needed CC-1 to find a replacement, and CC-1 agreed. On or about April 4, 2006, CC-1 told WEISHAAPT that a new girl was arriving at JFK Airport, and CC-1 and WEISHAAPT discussed arrangements for the girl to be picked up. And on or about May 13, 2006, WEISHAAPT asked CC-1 if Manhattan would be a better place for WEISHAAPT to work; CC-1 responded that he would look for an opening for WEISHAAPT and get back to her.

46. I have spoken to other ICE agents in Texas who informed me that, in about August 2005, they made immigration arrests at a prostitution business in Texas. While making those arrests, the ICE agents encountered WEISHAAPT, who was then working in the brothel as a manager.

"Magic," 106 Reidville Drive, Waterbury, Connecticut

Defendant SUN DANEMAN

47. I have reviewed summary translations of at least 12 phone calls between SUN DANEMAN, the defendant, and CC-1, who was then utilizing CELLPHONE 1, from on or about February 10, 2006, up to and including on or about April 25, 2006. During all of these calls, DANEMAN used the phone assigned number (253) 273-8388, which is a number subscribed to DANEMAN.

48. During the calls, DANEMAN repeatedly requested that CC-1 provide DANEMAN with girls, and CC-1 agreed to do so. For example, on or about February 13, 2005, DANEMAN told CC-1 she had

about 50 customers per week, and DANEMAN and CC-1 discussed CC-1's efforts to find DANEMAN a manager who had a green card. On or about February 15, 2006, CC-1 told DANEMAN he had an available girl who was born in 1977 and had a green card, and CC-1 agreed to bring the girl to DANEMAN. On or about February 17, 2006, DANEMAN and CC-1 again discussed CC-1 bringing DANEMAN girls; CC-1 told DANEMAN it is hard to find girls with green cards, and DANEMAN agreed that a girl without a green card would be alright, but a girl with a green card was preferable. On or about February 20, 2006, DANEMAN told CC-1 that a girl CC-1 had brought had left DANEMAN's business after crying. CC-1 agreed to bring a new girl the next day.

49. I also have reviewed records showing that, on or about April 28, 2006, DANEMAN was arrested by Waterbury, Connecticut police for operating a house of prostitution at 106 Reidville Drive in Waterbury. Furthermore, I have reviewed bank records showing that DANEMAN has been issued a report of suspicious bank activity based on her deposit of approximately \$94,000 in cash between June 2005 and September 2005.

Washington, DC-Area Prostitution Businesses

"14K Spa," 1413 K Street, Washington, DC

Defendant TAE NAM THOMPSON

50. I have reviewed summary translations of at least seven phone calls between TAE NAM THOMPSON, the defendant, and CC-1, who was then utilizing CELLPHONE 1, from on or about April 8, 2006, up to and including on or about May 10, 2006. During all of these calls, THOMPSON used the phone assigned number (336) 549-5283, which is subscribed to THOMPSON's husband. THOMPSON identified herself during several of the calls with CC-1 as the manager of "14K." I have obtained a photograph of THOMPSON from the North Carolina Department of Motor Vehicles.

51. During a series of calls on or about April 8, 2006 and April 12, 2006, THOMPSON asked CC-1 for a small girl; CC-1 agreed to find a small girl for THOMPSON; and THOMPSON asked CC-1 for another girl in addition to the girl THOMPSON had already requested. On or about April 18, 2006, THOMPSON complained to CC-1 that the girl CC-1 had brought was too tall and was not satisfactory. On or about April 20, 2006, THOMPSON called CC-1 again and told CC-1 that she had put out one of the girls CC-1 had brought, so CC-1 should bring a new girl.

Defendant UN SUN BROWN

52. I have reviewed summary translations of at least nine phone calls between UN SUN BROWN, the defendant, and CC-1, who was then utilizing CELLPHONE 1, from on or about February 15, 2006, up to and including on or about May 20, 2006. During all of these calls, BROWN used the phone assigned number (240) 426-8483, which is subscribed to BROWN. During one of those calls, on or about February 15, 2006, BROWN said she was calling from "14K Spa."

53. On or about February 15, 2006, BROWN told CC-1 she needed a girl with large breasts. On February 17, 2006, CC-1 stated that he would go to BROWN's location to pick up and/or drop off girls, and BROWN and CC-1 discussed the specific time and place where CC-1 would go to drop off and/or pick up girls for BROWN. On or about February 18, 2006, BROWN called CC-1, and CC-1 confirmed he would arrive in about one hour. In a separate phone call about six hours before this phone call, CC-1 told an unidentified female that he would pick her up later that night in Virginia. I have also reviewed highway toll records which show that, in the early evening of February 18, 2006, CC-1 crossed the Tri-Boro Bridge and then entered the New Jersey Turnpike, heading southbound.

54. I have reviewed BROWN's criminal record, which shows that BROWN was convicted of prostitution in Georgia in April 2005.

"Downtown," 1018 Vermont Avenue NW, Washington DC

Defendant CHUN GRANDT

55. I have reviewed summary translations of at least 23 phone calls between CHUN GRANDT, the defendant, and CC-1, who was then utilizing CELLPHONE 1, from on or about February 16, 2006, up to and including on or about April 17, 2006. During all of these calls, GRANDT used the phone assigned number (646) 417-1637, which is a number subscribed to GRANDT. During a call on February 16, 2006, GRANDT introduced herself as "Texas Imo" from "Downtown." I have obtained a photograph of GRANDT from GRANDT's New York state arrest record.

56. On or about February 16, 2006, GRANDT requested a girl from CC-1. The next day, GRANT called CC-1 back and again requested a girl for "Downtown" in Washington, DC. On February 19, 2006, GRANDT called CC-1 and requested girls and condoms. CC-1 replied that if he was unable to bring girls or condoms, he would find another driver to make the delivery.

57. Based on my review of GRANDT's criminal record, I have learned that GRANDT was arrested for prostitution and promoting prostitution in January 2006, and was later convicted in New York state court for creating a dangerous act. I also have reviewed a police report which shows that, in or about March 2006, GRANDT was arrested at Liberty Spa in Norwalk, Connecticut, along with MYONG SA, the defendant.

Defendant KUM OK LOWERY

58. I have reviewed summary translations of at least five phone calls between KUM OK LOWERY, the defendant, and CC-1, who was then utilizing CELLPHONE 1, from on or about February 9, 2006, up to and including on or about March 1, 2006. During all of these calls, LOWERY used the phone assigned number (703) 402-8588, which is a number subscribed to LOWERY. During the calls, LOWERY said she was calling from "Downtown."

59. On or about February 9, 2006, LOWERY asked CC-1 to bring one or two girls to "Downtown" whenever he is able. On or about February 13, 2006, LOWERY again called CC-1, asked CC-1 for a girl, and stated that she had gotten another girl from a different person. On or about February 16, 2005, LOWERY called CC-1 and asked for replacement girls for those who are leaving. CC-1 responded that he would look. On or about February 23, 2006, LOWERY called CC-1, and CC-1 confirmed that two girls who had recently arrived from Korea would be delivered to LOWERY in Washington, DC on Saturday, February 25, 2006. On February 25, 2006, CC-1 told an unidentified female he would pick her up at 8:00 p.m. CC-1 then spoke with another female, who told CC-1 the girl was packing and would be ready to leave soon. I have reviewed highway toll records that show that CC-1 crossed the Tri-Boro Bridge at approximately 7:47 p.m. on February 25, 2006, and then entered the New Jersey Turnpike heading southbound at approximately 8:03 p.m. Subsequent toll records show that, later that night, CC-1 drove south on Route 95 on his way to Washington DC. On or about March 1, 2006, LOWERY again called CC-1 and asked for more girls.

Defendant CHONG GIROUARD

60. I have reviewed summary translations of at least 22 phone calls between CHONG GIROUARD, the defendant, and CC-1, who was then utilizing CELLPHONE 1, from on or about March 2, 2006, up to and including on or about May 19, 2006. During all of these calls, GIROUARD used the phone assigned number (703) 447-3366, which is a number subscribed to GIROUARD. During these calls, GIROUARD identified herself as a manager at "Downtown." I

have obtained a photograph of GIROUARD from the Virginia Department of Motor Vehicles.

61. During several of those calls, GIROUARD asked CC-1 to supply girls for GIROUARD's business, and GIROUARD and CC-1 discussed specifics relating to the delivery of several women to GIROUARD's business, including the relative age and appearances of some of the girls. On one occasion, on or about March 3, 2006, GIROUARD told CC-1 that the girls at her business were tired because they had served 15 customers the previous night. On another occasion, on or about April 15, 2006, GIROUARD asked CC-1 to bring two boxes of condoms with him when he came to GIROUARD's business the next day. On another occasion, on or about April 28, 2006, GIROUARD told CC-1 that a girl CC-1 had recently brought wanted to leave, and GIROUARD asked CC-1 to speak to that girl who wanted to leave. GIROUARD further explained to CC-1 during that same call that she had only six girls working at the time, but needed eight girls because she would get up to 70 customers on a weekend.

"OK Spa," 2428 Wisconsin Avenue, NW, Washington DC

Defendant HYANG RAN KIM

62. I have reviewed summary translations of at least 22 phone calls between HYANG RAN KIM, the defendant, and CC-1, who was then utilizing CELLPHONE 1, from on or about February 9, 2006, up to and including on or about May 20, 2006. During all of these calls, KIM used the phone assigned number (202) 340-0396, which is subscribed to another person. In or about April 2005, the other person filed an immigration petition to obtain a green card for KIM, who he listed as an "alien relative." I also have reviewed record of an immigration interview conducted with KIM, which show that Kim was in possession of the phone assigned number (202) 340-0396 when she entered the United States from Mexico in or about July 2006. During several of the monitored phone calls, KIM identified herself as "Kim" or "Tina," and identified her place of business as "OK Spa." I have obtained a photograph of KIM from her immigration file.

63. KIM and CC-1 had numerous conversations about CC-1 bringing girls to work for KIM. For example, on or about February 14, 2006, CC-1 told KIM he had girls for KIM, and would deliver the girls the next day. CC-1 told KIM that one of the girls had big breasts. Kim told CC-1 she had not been raided by law enforcement for several months, and she believed the laws were looser in Washington, DC. KIM also told CC-1 she usually keeps three or four girls for 20 or more customers. On February

18, 2006, CC-1 told Kim he would bring her a young girl with big breasts. On March 13, 2006, KIM told CC-1 that it had been nearly a month since CC-1 had supplied Kim with girls, and Kim further told CC-1 she would like to get some young girls from CC-1. And on March 25, 2006, CC-1 asked KIM if she had been raided by law enforcement; KIM said she had not, and business was good due to increased customer demand.

**"Seng Hee's," a/k/a "Cleveland Park Holistic Health," 3520
Connecticut Avenue, NW, Washington, DC 20008**

Defendant SENG HEE RYAN

64. I have reviewed summary translations of at least 10 phone calls between SENG HEE RYAN, the defendant, and CC-1, who was then utilizing CELLPHONE 1, from on or about February 27, 2006, up to and including on or about May 3, 2006. During all of these calls, RYAN used the phone assigned number (202) 257-5792, which is a number subscribed to RYAN's husband, who resides with RYAN at the same address to which the phone is subscribed. During the calls, RYAN identified herself as "Seng Hee."

65. During the calls, RYAN repeatedly asked CC-1 to provide RYAN with girls, and CC-1 agreed. For example, on or about February 27, 2006, RYAN asked CC-1 to provide a new girl because one of RYAN's girls had a problem with breast augmentation. On or about March 3, 2006, CC-1 told RYAN he could supply her with a girl who used to work at a bathhouse in Korea, and RYAN agreed. On or about March 6, 2006, RYAN told CC-1 she was happy with the girl CC-1 had provided, and RYAN asked CC-1 to provide another girl. And on March 22, 2006 and March 27, 2006, RYAN asked CC-1 to provide another girl; CC-1 agreed.

Defendant KYUNGG HWA KIM

66. I have reviewed summary translations of at least 15 phone calls between KYUNGG HWA KIM, the defendant, and CC-1, who was then utilizing CELLPHONE 1, from on or about February 14, 2006, up to and including on or about May 21, 2006. During all of these calls, RYAN used the phone assigned number (347) 624-1219, which is a number subscribed to KIM. During the calls, CC-1 identified KIM as "KYUNGg Hwa" calling from "Seng Hee's."

67. On or about February 14, 2006, CC-1 told KIM he would come by the next day to pick up something to be delivered to New York. The next day, KIM called CC-1, who said he would arrive in an hour to make the pickup. On or about February 22, 2006, KIM asked CC-1 about law enforcement activity in Philadelphia. On or

about February 27, 2006, KIM and CC-1 discussed recent law enforcement activity in Washington DC, including the fact that an undercover officer made arrests at another prostitution business. On or about May 19, 2006, KIM called CC-1 to ask whether CC-1 was bringing a girl; CC-1 responded that he was bringing a small-breasted girl with a visa. KIM told CC-1 the girl needed to bring a passport and visa. And on or about May 21, 2006, KIM asked CC-1 to make a pickup on his way, and CC-1 agreed.

"Royal Spa," 520 10th Street, NW, Washington, DC

Defendant TAE YOUNG OH

68. I have reviewed summary translations of at least 38 phone calls between TAE YOUNG OH, the defendant, and CC-1, who was then utilizing CELLPHONE 1, from on or about February 10, 2006, up to and including on or about May 11, 2006. During all of these calls, OH used the phone assigned number (646) 302-4141, which is a number subscribed to OH's husband; I know that this person is OH's husband based on statements made by the husband to a bank investigator during an investigation of potential money laundering. I also have reviewed Lexis-Nexis database records which show that OH and her husband live at the same address, which is the same address to which the above phone number is subscribed. During several of the calls to CC-1, OH identified herself as "Tae Young."

69. On numerous occasions, OH asked CC-1 to provide girls, and CC-1 agreed. For example, on February 10, 2006, CC-1 arranged to bring an unidentified female to the Royal Spa in Washington, DC on Monday, February 13; CC-1 then called OH and told OH he had a girl and would bring the girl on Monday. On February 23, 2006, CC-1 told OH he had found a pretty girl with big breasts, who CC-1 would bring to OH. On March 6, 2006, CC-1 told OH he was bringing OH a younger girl; shortly thereafter, CC-1 arranged to bring an unidentified female to Royal Spa in Washington, DC. On March 9, 2006, CC-1 told OH the girl CC-1 was supposed to bring to OH had been arrested by immigration authorities at another establishment, and CC-1 said he was scared of immigration authorities. On or about March 12, 2006, OH told CC-1 that she had four girls, but needed more. And on April 28, 2006, OH told CC-1 she needed a girl. CC-1 responded that he had only older women, and OH said older women are fine if they have a certain style.

"Sun VIP Spa," 719 8th St., SE, Washington DC 20003

70. I have spoken to other law enforcement officials who

have informed me that, in or about July 2006, Washington DC police executed a search warrant at 719 8th Street, SE, Washington DC, and arrested at least two people for operating a prostitution business.

Defendant YONG HUI KIM

71. I have reviewed summary translations of at least 7 phone calls between YONG HUI KIM, the defendant, and CC-1, who was then utilizing CELLPHONE 1, from on or about February 19, 2006, up to and including on or about May 15, 2006. During all of these calls, KIM used the phone assigned number (703) 887-6561, which is a number subscribed to KIM. In or about April 2006, CC-1 gave another individual who was looking for a prostitution manager a business phone number for Sun VIP Spa, along with KIM's cellphone number.

72. On or about February 19, 2006, KIM asked CC-1 if he knew two girls at KIM's business. CC-1 said he knew one of the girls well, and KIM said something had come up with the girls. Later that day, KIM and CC-1 discussed CC-1 prior visits to KIM's business, and discussed a pickup of money to be sent to Korea. On or about March 9, 2006, KIM called CC-1 to ask about a raid by law enforcement on another prostitution business. On or about March 12, 2006, CC-1 told KIM he was bringing her a different girl than initially planned. On or about April 24, 2006, KIM asked CC-1 to pick up a traditional Korean costume for a girl, and CC-1 agreed. KIM also told CC-1 she needed small girls. On or about May 15, 2006, KIM told CC-1 she needed a small girl. CC-1 responded that he had a small girl and a regular-sized girl available.

"Moonlight," 1808 Woodlawn Drive, Suite F, Baltimore, Maryland

73. I have spoken with ICE agents based in Baltimore, who have informed me that they had investigated money laundering and other illegal activity at Moonlight, which is a prostitution business located at 1808 Woodlawn Drive in Baltimore, Maryland. Based on their investigation, including undercover operations, the Baltimore ICE agents confirmed that Moonlight was a prostitution business, and that the premises on which Moonlight was located had a hidden closet which was used to hide women who were illegal aliens.

Defendant MI SUN HAYES

74. I have reviewed summary translations of at least seven phone calls between MI SUN HAYES, the defendant, and CC-1, who

was then utilizing CELLPHONE 1, on or about February 13, 2006. During all of these calls, HAYES used the phone assigned number (704) 649-7891, which is subscribed to HAYES. I can spoken with ICE agents based on Baltimore who have surveilled HAYES at Moonlight. Those agents also have positively identified a photograph of HAYES.

75. On February 13, 2006, HAYES told CC-1 her business had been robbed of cash the night before, and HAYES asked CC-1 if any drivers had come to her business then. CC-1 said he would try to find out. Later, CC-1 told HAYES he could not find out if any drivers had been to her business. HAYES said she thought one of the girls CC-1 was going to pick up from the business had stolen the money. HAYES also said her lawyers told her she could not go to the police because she was employing girls who were in the country illegally. HAYES also said her lawyers told her to hire somebody to the give the girls a polygraph about the missing money. HAYES and CC-1 then discussed a specific girl who CC-1 had brought to HAYES.

Defendant YONG CHONG

76. I have reviewed summary translations of at least 13 phone calls between YONG CHONG, the defendant, and CC-1, who was then utilizing CELLPHONE 1, from on or about March 11, 2006, up to and including on or about April 12, 2006. During all of these calls, CHONG used the phone assigned number (718) 662-6666, which is a number subscribed to CHONG. During the calls, CHONG identified herself as "Ra Ra." In March 2006, CHONG told CC-1 that she was working at "Oasis," and, beginning in early April 2006, CHONG stated to CC-1 that she had begun working at Moonlight in Baltimore.

77. During several of those calls, CHONG asked CC-1 to provide her with girls. For example, on or about March 11, 2006, CHONG asked CC-1 to provide two girls, and CC-1 agreed. The next day, CHONG called CC-1 again about finding girls; CC-1 stated that he had one girl, but the girl did not have large breasts, as CHONG had requested. On or about March 14, 2006, CHONG told CC-1 that her business was going to be inspected the following week. And on or about April 4, 2006, CHONG and CC-1 discussed a girl who does not have a green card; CHONG stated she was then at Moonlight in Baltimore and would accept the girl there the following day.

78. I have reviewed CHONG's criminal record, which shows that CHONG was convicted in or about January 2004 in Queens County Criminal Court for promoting prostitution. CHONG also was

convicted in Queens County Superior Court in or about May 2005 for "unauthorized practice of a profession."

Unnamed Prostitution Business, Maryland

Defendant MI JA PARK

79. I have reviewed summary translations of at least 9 phone calls between MI JA PARK, the defendant, and CC-1, who was then utilizing CELLPHONE 1, from on or about February 13, 2006, up to and including on or about May 11, 2006. During all of these calls, PARK used the phone assigned number (202) 436-5372, which is a number subscribed to PARK. Further, the individual listed as a financially responsible party on that account had previously filed immigration papers for PARK, listing PARK as his wife. During the calls, both PARK and CC-1 identified PARK as "Mi Ja." I have obtained a photo of PARK from her immigration file.

80. On several occasions, PARK asked CC-1 to supply her business with girls, and CC-1 agreed to try to find a girl to provide to PARK. For example, on or about February 15, 2006, PARK asked CC-1 if he had spoken to the girl; CC-1 said he hadn't and that girls are reluctant to work at an "internet place"; PARK assured CC-1 that she had a selected customer base. And on April 25, 2006, PARK told CC-1 she needed more girls, and CC-1 said he would call back when more girls were available.

Philadelphia-Area Prostitution Businesses

"Good Natural," 4790 West Market Street, York, Pennsylvania

Defendant SUN IM AN

81. I have reviewed summary translations of at least 13 phone calls between SUN IM AN, the defendant, and CC-1, who was then utilizing CELLPHONE 1, from on or about February 15, 2006, up to and including on or about April 5, 2006. During all of these calls, AN used the phone assigned number (301) 613-5593, which is a number subscribed to another person. I have reviewed Lexis-Nexis database records which show that the other person and AN share an address. On or about May 4, 2006, an individual called CC-1 from "Good Natural," and stated that the owner of the business was then on vacation in Mexico. I have reviewed travel documents, including customs declarations, which show that AN and the other person returned together to the United States from Mexico on or about May 17, 2006. I also have reviewed a statement made by AN to a customs officer, in which AN stated

that the other person was her fiancée.

82. During several calls with CC-1, AN stated she was calling from "Good Natural." AN repeatedly requested that CC-1 provide AN with girls, and CC-1 agreed to do so. For example, on or about February 17, 2006, CC-1 told AN he was looking for girls for AN; AN responded that the last girl CC-1 brought was using drugs, and that CC-1 needed to be more careful. AN then stated she was looking for two new girls, and CC-1 said he was looking for girls for AN. As another example, on or about March 19, 2006, AN asked CC-1 to find a girl with big breasts; later that day, CC-1 called AN with a description of a girl he could provide to AN, but AN said she wanted a higher quality girl. And on or about April 3, 2006, CC-1 told AN he was going to send a different girl than originally planned to AN's business because a girl who CC-1 was originally going to bring to AN was menstruating. AN agreed to have CC-1 bring a different girl.

"Callowhill Relaxation Center," 1041 Ridge Avenue, Philadelphia, Pennsylvania

83. I have spoken with ICE agents based in Philadelphia, and I have reviewed documents provided by those agents. Based on those conversations and documents, I know that, in or about February 2005, law enforcement agents raided the Callowhill Relaxation Center, located at 1041 Ridge Avenue in Philadelphia, Pennsylvania, and made at least two arrests based on immigration violations. Philadelphia ICE agents confirmed that the Callowhill Relaxation Center was engaged in the business of prostitution.

Defendant MYONG MOON

84. I have reviewed summary translations of at least 15 phone calls between MYONG MOON, the defendant, and CC-1, who was then utilizing CELLPHONE 1, from on or about February 16, 2006, up to and including on or about May 11, 2006. During all of these calls, MOON used the phone assigned number (719) 963-3291, which is a number subscribed to MOON. During the calls, MOON identified herself as "Debbie," and said she was calling from "Callowhill." I have obtained a photograph of MOON from her immigration file.

85. On or about February 16, 2006, MOON told CC-1 she was calling on her own cellphone from Callowhill and wanted to confirm that CC-1 would be arriving the next day. On or about February 22, 2006, MOON told CC-1 she needed a girl with large breasts, and CC-1 said he had a girl in mind and would call back.

Again the following day, MOON asked CC-1 to provide a girl, and CC-1 agreed; CC-1 called MOON back later and stated he had a girl with big breasts who he could deliver to MOON later that week. On or about February 28, 2006, MOON thanked CC-1 for the girl, and MOON told CC-1 the girl was working out very well. Again in March 2006, MOON requested that CC-1 provide a girl, and CC-1 agreed. Also, on or about May 11, 2006, CC-1 called MOON and warned her that a nearby location as been raided by law enforcement, and MOON and CC-1 discussed whether the officers were in uniform or plainclothes. CC-1 said he learned about the raid from a girl who fled the location and called CC-1 to tell him about the raid.

Defendant JUNG LIM

86. I have reviewed summary translations of at least 27 phone calls between JUNG LIM, the defendant, and CC-1, who was then utilizing CELLPHONE 1, from on or about February 17, 2006, up to and including on or about May 2, 2006. During all of these calls, LIM used the phone assigned number (917) 359-6842, which is a number subscribed to LIM. LIM at times identified herself as "Big Sister Miko."

87. On or about February 18, 2006, LIM asked CC-1 if CC-1 had met with another individual to deliver money. LIM thanked CC-1 for helping her business. On or about March 1, 2006, LIM told CC-1 that one girl CC-1 brought was good, but the other was not as good. LIM asked CC-1 to take the girl who was not as good to another business. LIM told CC-1 she has about 50 customers on weekdays, and 60 customers on weekends, most of whom make appointments. On or about March 1, 2006, CC-1 confirmed that he would bring a girl to LIM's business later that week, as agreed. LIM said she would pay CC-1 a special commission. On or about March 6, LIM and CC-1 discussed recent law enforcement activity at her business. LIM told CC-1 she had discussed the issue with her lawyer and decided to close down until the law enforcement issues were resolved. On or about March 13, 2006, CC-1 told LIM had somebody ready and waiting to leave Flushing, New York. On or about March 22, 2006, LIM told CC-1 she would be reopening shortly, and that she needed CC-1 to find girls because she had about 40 customers who had already been calling. Throughout April 2006, CC-1 agreed to place girls with LIM's business. On April 20, 2006, CC-1 told LIM that he was going to drop off a new girl with LIM, and that a representative of CC-1 was taking back a different girl who CC-1 had recently sent to LIM.

"Smile," 1541 North West End Boulevard, Quakertown, Pennsylvania

Defendant EUN JA PARK

88. I have reviewed summary translations of at least six phone calls between EUN JA PARK, the defendant, and CC-1, who was then utilizing CELLPHONE 1, from on or about February 18, 2006, up to and including on or about April 28, 2006. During all of these calls, PARK used the phone assigned number (703) 861-8546 which is a number subscribed to another person. Based on PARK's immigration file, I have learned that the other person is PARK's husband. Also, during her calls with CC-1, PARK identified herself as "Eun Ja," and PARK told CC-1 she worked at "Smile."

89. On or about March 22, 2006, CC-1 told PARK he would bring her a girl the next day; PARK said she did not need a girl at that time. On or about April 28, 2006, PARK called CC-1 and said she needed a girl for Smile by the next day. CC-1 responded that he had a girl, but PARK said she remembered that girl and did not want her. CC-1 then said he would continue to look for a girl for PARK.

WHEREFORE, deponent prays that warrants be issued for the arrests of KYO HWA ADLER, SUN IM AN, JI HYUN BANG, AEOK BOYDSTON, a/k/a "Big Sister Lillie," UN SUN BROWN, KIM CHONG, a/k/a "Big Sister Lora," YONG CHONG, a/k/a "Ra Ra," SUN DANEMAN, CHONG GIROUARD, CHUN GRANDT, a/k/a "Texas Imo," MI SUN HAYES, AN SOON KIM, HYANG RAN KIM, a/k/a "Tina," HYEAE KIM, a/k/a "Patty Kim," KYUNG HWA KIM, YONG HUI KIM, KYONG HEE LEE, JUNG LIM, a/k/a "Big Sister Miko," KUM OK LOWERY, MYONG MOON, a/k/a "Debbie," TAE YOUNG OH, EUN JA PARK, MI JA PARK, SUNG SU PLOURDE, SENG HEE RYAN, MYONG SA, JAE SHIM, HYO WON SMITH, a/k/a "Niko," TAE NAM THOMPSON, CHONG WEISHAUP, the defendants, and that the defendants be imprisoned or bailed as the case may be.'

MICHAEL P. CONLON
SPECIAL AGENT
UNITED STATES IMMIGRATION AND CUSTOMS ENFORCEMENT

Sworn to before me this
___ day of August 2006

UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF NEW YORK

PKC:STM
F.# 2006R00790

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

- - - - -X

UNITED STATES OF AMERICA

v.

TAE HOON KIM,
 also known as "Tae Won,"
SUNG CHUL IL,
 also known as "Seong-Cheol" and
 "Cheol-I,"
FNU LNU,
 also known as "Seong Ho,"
TAE JUN PARK,
 also known as "Tae Ho Choi,"
DO HYUP BAE,
 also known as "Do Hyeop,"

REDACTED

KYONG POLACHEK,
 also known as "Ji-Yeon Kim,"
 "Jennifer" and
 "Hana,"
BYOUNG IL SON,
 also known as "Mr. Son,"
JIN SOOK KIM LEE,
MIAE CHOI-SON and
FNU LNU,
 also known as "Jong Tae,"

Defendants.

- - - - -X

EASTERN DISTRICT OF NEW YORK, SS:

WON YOON, being duly sworn, deposes and says that he is
a Special Agent with the Federal Bureau of Investigation (the
"FBI"), duly appointed according to law and acting as such.

Upon information and belief, on or about and between
February 2006 and August 2006, both dates being approximate and

REDACTED

Filed Under Seal

AFFIDAVIT IN SUPPORT
OF ARREST WARRANTS
(T. 18, U.S.C., §§ 2,
371, 2421, 1960(a)
and 3148)

inclusive, within the Eastern District of New York and elsewhere, the defendants TAE HOON KIM, also known as "Tae Won," SUNG CHUL IL, also known as "Seong-Cheol" and "Cheol-I," FNU LNU, also known as "Seong Ho," TAE JUN PARK, also known as "Tae Ho Choi," DO HYUP BAE, also known as "Do Hyeop," **REDACTED**

and KYONG POLACHEK, also known as "Ji-Yeon Kim," "Jennifer" and "Hana," together with others, did knowingly and intentionally transport an individual in interstate and foreign commerce with intent that such individual engage in prostitution.

(Title 18, United States Code, Sections 2421 and 2)

Upon information and belief, there is probable cause to believe that on or about and between February 2006 and August 2006, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants TAE HOON KIM, also known as "Tae Won," BYOUNG IL SON, also known as "Mr. SON," JIN SOOK KIM LEE, MIAE CHOI-SON and FNU LNU, also known as "Jong Tae," together with others, did knowingly and intentionally conspire to conduct, control, manage, supervise, direct and own all and part of a business, knowing that the business was an illegal money transmitting business, which affected interstate and foreign commerce, in violation of Title 18, United States Code, Section 1960(a).

(Title 18, United States Code, Section 371)

Upon information and belief, on or about and between February 2006 and August 2006, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere,

the defendant BYOUNG IL SON, also known as "Mr. Son," having been released on bail, did knowingly and intentionally commit another federal violation while on bail, to wit, conspiracy to violate Title 18, United States Code, Section 1960(a), in violation of a condition of his release.

(Title 18, United States Code, Section 3148)

The source of your deponent's information and the grounds for his belief are as follows:

I. Introduction

1. Since 2002, I have been a Special Agent with the FBI, and since April 2003, I have been assigned to the Asian Criminal Enterprises Unit of the New York Division of the Federal Bureau of Investigation ("FBI"). From 1997 to 2002, I served as an officer with the Nassau County Police Department.

2. I have personally participated in the instant investigation of the defendants. I am fully familiar with the facts and circumstances of this investigation based upon my participation in the investigation; my review of conversations intercepted pursuant to court authorization, either by listening to the recordings or reviewing transcripts of the recordings;¹ my review of oral and written reports about this and other investigations that I have received from other Special Agents of the FBI and the Department of Homeland Security, Immigration and

^{1/} Most of these conversations are in Korean, but I speak, read, and write fluently in Korean. In addition, these conversations were also summarized in writing and in English by Korean translators.

Customs Enforcement ("ICE"), officers of the New York City Police Department, and other state, local and federal law enforcement officers; physical surveillance of the defendants by me and other law enforcement agents and officers; witness interviews; and my review of records and documents including, but not limited to, analysis of telephone toll records, pen register records, and subscriber information.

3. In the portions of this Affidavit that describe the intercepted conversations, not all relevant intercepted communications are described. Moreover, for those communications that are described herein, not all relevant portions of these conversations have been described. Unless otherwise indicated, these descriptions are based upon preliminary non-verbatim summaries of the conversations prepared by translators. To the extent that quotations are used in the descriptions, the quoted segments are based on line sheets and reviews of recordings and not final transcripts. Also, all dates and times are approximate and based on the monitoring equipment at the time the communication was intercepted. Lastly, bracketed information within the descriptions of the intercepted conversations is based on other evidence obtained during the investigation or on my interpretation of the conversation given the context of the conversation and my knowledge of the investigation.

4. In the section below that describes surveillance, all surveillance was conducted by Special Agents of the FBI, including myself, and ICE. The observations of the other law

enforcement agents have been related to me to supplement the activities that I personally observed.

5. Through my training, education and experience, I have also become familiar with the illegal transmission of money, also known as "hawala," whereby money is transferred via a network of hawala brokers, or "hawaladars." Typically, an individual approaches a hawala broker in one city and gives the broker money to be transferred at black market currency exchange rates to a recipient in a foreign city. The hawala broker calls another hawala broker in the recipient's city and tells the recipient broker how much money and to whom to disperse the funds, minus a small commission, with the assurance that the debt will be settled later. In conjunction with hawala transactions, I have also become familiar with the efforts of persons involved in such activity to avoid detection by law enforcement.

6. Because this Affidavit is being submitted for the limited purpose of obtaining arrest warrants, I have not set forth each and every fact learned during the course of this investigation, but simply those facts that I believe are necessary to establish probable cause to obtain the requested warrants. Where actions, conversations, and statements of others are reported in this Affidavit, they are reported in substance and in part unless otherwise indicated. Additionally, except as explicitly set forth herein, I have not distinguished in this Affidavit between facts of which I have personal knowledge and facts as to which I have hearsay or second-hand knowledge.

II. Probable Cause for the Requested Warrants

A. Background: Cho/Chae Investigation

7. Since approximately May 2005, the FBI and ICE have been conducting a joint investigation into the smuggling, trafficking and transportation of women from Korea into the United States for the purpose of prostitution. The initial investigation focused on two individuals, Ae Soon Cho, also known as "Gina Kim" ("Cho"), and Geeho Chae ("Chae"), who were operating a large brothel in Flushing, New York, in which women from Korea worked as prostitutes.

8. In November 2005, court authorization was obtained to intercept conversations over Cho's and Chae's telephones (respectively, the "Cho Wiretap" and "Chae Wiretap"). Pursuant to subsequent re-authorizations, the Cho and Chae Wiretaps continued until March 8, 2006. Based on conversations intercepted through the Cho and Chae Wiretaps and additional investigation, a third wiretap was obtained on March 8, 2006 for the cellular telephone of defendant TAE HOON KIM, also known as "Tae Won" (the "KIM Wiretap"). Pursuant to subsequent re-authorizations, the KIM Wiretap continued until June 4, 2006.

9. Through the Cho/Chae investigation, the FBI and ICE determined that between approximately January 2004 and March 2006, Cho and Chae operated four brothels in Queens at which they employed numerous prostitutes who were from Korea. Many of the women had entered the United States illegally without visas or had entered with visas that were fraudulently obtained. In

addition to operating the brothels, Cho and Chae maintained a separate residence (also known as a "stash" or "resting" house) to house their prostitutes. Cho's and Chae's brothels generally charged customers between \$140 and \$200 per session and generated approximately \$4,000 per day in revenue.

10. Through the investigation, FBI and ICE also determined that there existed a large number of Korean brothels similar in operation to Cho's and Chae's brothels that extended along the eastern seaboard from Massachusetts to Georgia. The brothel owners, including Cho and Chae, relied on the services of a network of Korean middlemen who were based in Queens, New York, including defendant TAE HOON KIM, also known as "Tae Won" ("KIM") and other defendants, to arrange for prostitutes to work at and be transported to and between the brothels. The brothel owners asked the middlemen to find women for their brothels based on certain criteria such as immigration status, age, looks and body type. The middlemen also assisted the women in identifying and obtaining more lucrative and favorable work conditions among the various brothels.

11. Through the investigation, the FBI and ICE also determined that KIM and other defendants assisted the Korean brothel owners and prostitutes in transmitting proceeds from their brothel activities and other funds overseas, usually to Korea, through unlicensed money transmitters.

12. On March 8, 2006, Cho and Chae were arrested by FBI and ICE agents. On April 6, 2006, they were indicted in this

District on charges of conspiring to employ and harbor aliens for the purpose of prostitution, and conspiring to bribe and bribing New York City Police Department detectives in order to protect their brothel operation. (United States v. Ae Soon Cho, et al., 06 CR 234(SLT)).

B. The Defendants' Role as Middlemen for the Brothels

13. Wiretap Evidence. The KIM Wiretap revealed conversations on an almost daily basis between defendant KIM and various brothel owners, prostitutes, and other drivers and middlemen, including defendants SUNG CHUL IL, also known as "Seong-Cheol" and "Cheol-I," FNU LNU, also known as "Seong Ho," TAE JUN PARK, also known as "Tae Ho Choi," DO HYUP BAE, also known as "Do Hyeop," **REDACTED**

and KYONG POLACHEK, also known as "Ji-Yeon Kim," "Jennifer" and "Hana," in which KIM negotiated, discussed, and arranged for prostitutes to work at and be transported to and between brothels in several different states and the District of Columbia, as set forth below.

- (i) SUNG CHUL IL, also known as "Seong Cheol" and "Cheol-I" ("CHEOL-I")

Washington, D.C.

14. On February 23, 2006, at approximately 7:30 p.m., KIM told CHEOL-I that a female known as "Su Jeong" would be flying out of Los Angeles the following evening and would arrive at Reagan International airport [in Virginia] at approximately 10:00 or 11:00 p.m. CHEOL-I asked Su Jeong's age, if she was attractive, and if she had large breasts. KIM responded that Su Jeong was 29 or 30 years old, that she was not great but okay, and that she had average-sized breasts. KIM told CHEOL-I to call Su Jeong for more information and for her schedule, and KIM provided CHEOL-I with Su Jeong's telephone number. At approximately 7:27 p.m., Su Jeong called from a Los Angeles-based cellular mobile telephone number. Su Jeong asked KIM where she would be working, and KIM responded that it was "Dupont" [brothel in Washington, D.C.]. KIM told Su Jeong to fly directly to Washington, D.C., so that KIM could pick her up at and take her directly to the brothel. KIM also told Su Jeong that she could earn \$20,000 [per month]. At approximately 8:58 p.m., KIM received a call from a female known as "Eun Ju," who was also flying into Reagan Airport from Los Angeles the following day. Eun Ju asked how much she should pay for the transportation fee from the Washington airport to the brothel. KIM said that it would cost \$500, and that CHEOL-I would be driving her. FNU LNU 1 stated that she would arrive at 8:20 p.m., and had already talked with CHEOL-I. FNU LNU 1 asked KIM how much she could earn

at the "Dupont" brothel [in Washington, D.C.] where she would be working. KIM stated that, according to CHEOL-I, FNU LNU 1 could make \$20,000 [per month]. At 11:25 p.m. on the same date, CHEOL-I called KIM for directions to Reagan Airport.

Pennsylvania

15. On February 28, 2006, at approximately 3:49 p.m., an unknown female, FNU LNU 2, who was calling from "Grandma's" [brothel in Washington, D.C.], asked KIM if KIM supplied girls^{2/} to "Smile" brothel [in Pennsylvania]. KIM confirmed that he did, and FNU LNU 2 informed KIM that there would be an opening at "Smile" on March 3rd. KIM stated that it was CHEOL-I's turn to provide girls for "Smile," and that KIM's turn would be on the 24th.

16. On March 5, 2006, at approximately 9:58 p.m., an unknown female, FNU LNU 3, called KIM and asked him to place her at "Smile" brothel in Pennsylvania. KIM told FNU LNU 3 that another girl was being placed at "Smile" through CHEOL-I, and that only KIM and CHEOL-I were supplying girls to that brothel. KIM gave CHEOL-I's phone number to FNU LNU 3 and told her to call CHEOL-I for more information.

17. On March 6, 2006, at approximately 6:00 p.m., KIM spoke with an unknown female, FNU LNU 4, who asked KIM to place her in a brothel. FNU LNU 4 said that the income in Washington, D.C. was approximately \$17,000, but that going to remote

^{2/} The term "girl" is a literal translation of the word used by the participants in the intercepted conversations, but does not necessarily refer to minors or underage women.

locations was not worth the transportation costs. FNU LNU 4 stated that the last time she went to an Ohio brothel through CHEOL-I, she paid \$800 in transportation costs but did not earn much at the brothel.

18. On April 13, 2006, at approximately 4:26 p.m., CHEOL-I told KIM that he (CHEOL-I) had taken a girl to Big Sister Kim's brothel in Connecticut that day. KIM commented that girls can make between \$15,000 to \$17,000 in that brothel. KIM commented that "Oriental" brothel in Washington, D.C., which was open 24 hours a day and used to be called "Boss" brothel, was also doing good business. CHEOL-I agreed. KIM stated that he was the one who had recommended to Laura, who now owns Oriental, that she buy the brothel, and that it cost her \$130,000. KIM stated that ["Oriental's"] business was booming, and that three girls worked there, serving thirteen customers a day, seven days a week. KIM and CHEOL-I commented that Laura also had good business in Atlantic City [New Jersey]. KIM stated that "Oriental" brothel in Washington, D.C. was the best, but that "Oriental" in Connecticut was getting better. KIM and CHEOL-I agreed that they wished they owned places like these. KIM and CHEOL-I also discussed customer traffic and earning potential for "Yorktown," "Oasis" and "Good Natural" brothels [all in Pennsylvania]. KIM asked CHEOL-I how long KIM and CHEOL-I had been doing "this work," and CHEOL-I responded that it had already been four years. KIM commented that although CHEOL-I was

arrested many times for this type of work, he had gotten rich. CHEOL-I agreed.

19. On May 12, 2006, at approximately 5:31 p.m., defendant TAE JUN PARK, also known as "Tae Ho Choi" ("CHOI") told KIM that Kyung-Jin^{3/} [a brothel worker] had been arrested during a Rhode Island raid. KIM stated that he was close to Kyung-Jin. At approximately 8:42 p.m. that day, CHEOL-I asked KIM if he knew any of the girls who were arrested [at "Downtown" in Rhode Island.] KIM said that he knew Kyung-Jin. CHEOL-I said that Kyung-Jin was detained by Immigration because she did not have a green card. CHEOL-I and KIM discussed the possibility that Kyung-Jin could be deported. KIM stated that he pitied Kyung-Jin and that he had placed her at "MaekDo's" [the owner of "Downtown"] brothel a long time ago. At approximately 9:05 p.m., a female known as "Big Sister MaekDo" asked KIM if there were sex workers with valid visas available. MaekDo urged KIM to look for sex workers for "Downtown" immediately, as her business was extremely busy.

20. On June 2, 2006, at approximately 7:25 p.m., an unknown female, FNU LNU 5, told KIM that DO HYEOP had told her that the girls arrested from "Downtown" brothel in Rhode Island were asked to identify drivers. KIM stated that he had heard the same directly from the arrested girls. KIM stated that a Korean cop asked the Rhode Island girls about the drivers, but that the

^{3/} Interpreters phonetically translated "KYUNG JIN" as "Gyeong-Jin" during the initial synopsis for this recorded conversation.

girls said they had taken a bus from a casino. KIM stated that his (KIM'S) name was also mentioned during Cho's arrest. FNU LNU 5 said that she had seen DO HYEOP earlier and that DO HYEOP was very stressed because his name, along with KIM's and CHEOL-I's names, were mentioned by law enforcement during the Rhode Island raid.^{4/}

(ii) FNU LNU, also known as "Seong Ho" ("SEONG HO")
Connecticut

21. On February 15, 2006, at approximately 8:54 p.m., KIM called an unknown female, FNU LNU 6. [FNU LNU 6 is the owner of "Magic" brothel in Waterbury, Connecticut.] KIM told her that he had a female with a permanent resident card that he could place at FNU LNU 6's brothel on Saturday, February 18, 2006.

22. On February 17, 2006, at approximately 7:15 p.m., KIM told a female known as "Candy" that his brother-in-law would be driving her from New York to an undisclosed location at 8:00 p.m. the following day. [SEONG HO is the brother of KIM's wife, JIN SOOK KIM LEE ("JIN SOOK").]

^{4/} On May 11, 2006, ICE raided several brothels, including "Downtown," in Providence, Rhode Island. Following the raid, FBI and ICE agents interviewed numerous workers arrested at those locations. The owner of "Downtown" is known as "MaekDo." Among the interviewed workers was a female identified as Kyung Jin Park. During Park's interview, she claimed that she had arrived at "Downtown" via a bus from a gambling parlor. Although she denied working as a prostitute, she admitted knowing KIM. However, she claimed that KIM was a friend and had never transported her to any brothel or arranged for her to work as a prostitute. A consent search of Ms. Park's cellular mobile telephone revealed the telephone numbers of KIM, CHEOL-I, DO HYEOP, another middleman by the name of Minseok Kong, also known as "Su Bok," and numerous known sex workers.

23. On February 17, 2006, at approximately 8:13 p.m., FNU LNU 6 [the owner of "Magic" brothel] called KIM, who told FNU LNU 6 that KIM would be taking a girl to her brothel at 8:00 p.m. the following day.

24. On February 18, 2006, at approximately 5:15 p.m., KIM told FNU LNU 6 that his brother-in-law, SEONG HO, would be transporting the girl to her brothel that evening. FNU LNU 6 provided KIM with the phone number to the brothel, which indicated that the brothel was located in Connecticut.

25. On February 18, 2006, at approximately 5:22 p.m., KIM gave Candy's phone number to SEONG HO and ordered SEONG HO to call Candy at 7:00 p.m. to confirm her ride to "Magic" at 8:00 p.m. SEONG HO confirmed that "Magic" was the brothel behind the gas station. KIM told SEONG HO to get \$200 from Candy for the ride. Subsequently, SEONG HO called KIM and told KIM that SEONG HO's departure time had changed to 9:00 p.m.

26. On February 18, 2006, at approximately 10:09 p.m., KIM informed FNU LNU 6 that the sex worker had left for FNU LNU 6's brothel ["Magic"] at 9:00 p.m., and would be there in 30 minutes to one hour. At approximately 11:11 p.m., SEONG HO called KIM and told KIM that the girl he had transported had given him \$340, which was too much money.

Washington, D.C.

27. On February 27, 2006, at approximately 4:46 p.m., KIM called a female known as "Eun Jeong" who was staying at Cho's resting house located at 149-16 Barkley Avenue in Queens, New

York. KIM told Eun-Jeong that he would be picking up an unknown female, FNU LNU 7, from the Barkley Avenue location, and that Eun-Jeong should tell FNU LNU 7 to be ready by 6:40 p.m.

28. On February 27, 2006, at approximately 5:16 p.m., KIM told SEONG HO to go to "18" brothel [in Washington, D.C.] and collect money from a female known as "Ji-min." KIM told SEONG HO to also pick up an unknown female, FNU LNU 8, from 149-16 Barkley by 6:00 p.m. and take her to "Grandma's" brothel [in Washington, D.C.]. KIM further instructed SEONG HO to take a female known as "Min-jeong" to "Royal" brothel. KIM told SEONG HO that the transportation fee would be \$400 for FNU LNU 8 and Min-Jeong. KIM told SEONG HO that he might need to pick up another female, FNU LNU 9, from "Royal" and told SEONG HO to collect \$250 from FNU LNU 9 as a transportation fee. At approximately 8:35 p.m., KIM again gave SEONG HO detailed directions to "Grandma's Place" brothel in Washington, D.C. On February 28, 2006, at approximately 12:07 a.m., KIM told SEONG HO to go to "Happiness" and "Royal" brothels in Washington, D.C. At approximately 12:43 a.m., SEONG HO told KIM that he went to "Royal" and received \$400 from Min-Jeong, who also gave SEONG HO an envelope for KIM. SEONG HO told KIM that "Grandma's" had underpaid by \$200. SEONG HO told KIM he had received money from a female known as "Mimi" at Happiness, and received two envelopes from Happiness, but did not get any transportation fee. KIM told SEONG HO that, next time, he should ask the girls or owners to pay the transportation fee. KIM stated that, if there is a girl who asks for a delivery

of an item, that SEONG HO should tell her the charge would be \$50 regardless. SEONG HO said that he understood and agreed to make a final stop at "18" [brothel in Washington, D.C.] for KIM .

South Carolina

29. On March 31, 2006, at approximately 3:57 p.m., KIM told SEONG HO to charge girls \$1,000 to \$1,300 if they wanted to go to South Carolina, given that it takes 15 hours to drive to Georgia.

Connecticut

30. On April 14, 2006, at approximately 7:17 p.m., KIM told SEONG HO to pick up an unknown female, FNU LNU 10, from a motel in Flushing [Queens, New York] and take her to "Liberty" brothel in Connecticut. KIM gave SEONG HO directions to "Liberty."

Pennsylvania

31. On May 11, 2006, at approximately 2:58 p.m., KIM told SEONG HO to go to a Chinese bus terminal near "Royal" brothel in Philadelphia [Pennsylvania]. KIM told SEONG HO that the brothel was raided and that all the girls had been taken away, except one girl who had escaped and was at the bus terminal.

(iii) TAE JUN PARK, also known as "Tae Ho Choi"
("CHOI")

Connecticut

32. On February 27, 2006, at approximately 4:19 p.m., a female known as "Yumi" asked KIM if there was any work available for her, specifically a place with fewer working girls

and fewer customers [ie., a less busy location]. KIM said he would try to find a place for her and let her know immediately. At approximately 5:24 p.m. on the same date, KIM told Yumi that she would be going to "Crystal" [brothel] and that she should be ready by 8:00. KIM told Yumi that the brothel was not open 24 hours a day, but that she would have to work as soon as she arrived there. KIM told Yumi that his "younger brother" [a Korean term that does not necessarily mean a familial relationship and can refer to a friend or associate] would be taking her to the brothel.

33. On February 27, 2006, at approximately 7:30 p.m., KIM asked CHOI to pick up an unknown female, FNU LNU 11, and take her to "Crystal" [brothel] in [Norwalk] Connecticut. CHOI asked which exit he should take, and KIM responded that he believed that "Nirvana" [brothel] was off of exit 15, and that "Crystal" was off of exit 14. KIM told CHOI to pick up FNU LNU 11 at 8:00 [p.m.], and that the transportation fee would be \$150. CHOI said that he understood. At approximately 8:45 p.m. on the same day, KIM asked CHOI when he would be arriving in Connecticut, and CHOI responded that he would be arriving in 30 minutes. KIM reminded CHOI to use exit 14. At approximately 9:16 p.m., CHOI told KIM that KIM had forgotten to buy "rubbers" [condoms] for the brothel that CHOI had gone to that day.

34. On March 6, 2006, at approximately 1:57 p.m., CHOI complained to KIM that the owner of "Crystal" treated the

girls poorly. KIM remind CHOI to pick up a girl from "Crystal" by 4:30 p.m.

35. On March 14, 2006, at approximately 9:13 p.m., while CHOI and KIM were both transporting girls, they discussed how much girls were making at a brothel named "Central" [in Rhode Island]. KIM responded that girls could easily make \$18,000 to \$20,000 per month. CHOI stated that he would be going to "Central" the following Saturday.

36. On April 10, 2006, at approximately 11:22 p.m., KIM complained to CHOI that work was slow. CHOI stated that he was trying to steer girls to KIM for rides instead of DO HYEOP. CHOI recommended that KIM call a female known as "Su-a" because Su-A wanted to be placed at "Grandma's" brothel. CHOI had recommended KIM to Su-A because KIM knew so many brothels. CHOI also mentioned that he had taken Yuni to [Big Sister] Lilly's brothel in Manhattan. KIM said that he was receiving a lot of calls from "Lilly's." KIM stated that there was a shortage of brothel positions, but not of girls. CHOI asked KIM about business in Pittsburgh [Pennsylvania], and KIM responded that business there was not good.

37. On April 29, 2006, at approximately 7:55 p.m., CHOI and KIM discussed the recent raid on brothels in Waterbury, Connecticut. CHOI stated that he was bailing out numerous girls who had been arrested. CHOI noted that he had to bail out an additional girl because he had her passport. CHOI and KIM

discussed the fact that a driver was also arrested during the raid.

38. On May 9, 2006, at approximately 7:34 p.m., CHOI asked KIM if there was a girl available to go to "Nirvana" [brothel in Connecticut]. KIM stated that he would ask around. CHOI and KIM discussed how girls were leaving "Nirvana" because of the raid. CHOI stated that he had supplied a female known as "Mi-Yeong" to "Nirvana" two days earlier, and that CHOI had supplied Mi-Yeong's friend [to Nirvana] that day. CHOI noted that business at "Nirvana" was good, and that he would be going to Connecticut again that day.

39. June 2, 2006, at approximately 10:50 p.m., CHOI told KIM that "Big Sisters" [older sex workers] had nowhere to work since the raid at "Hong Kong" brothel [in Waterbury, Connecticut]. KIM agreed, and added that there were no good income-generating brothels in Manhattan that would hire older sex workers. CHOI stated that he had tried to place a woman at "Lilly's" brothel [in Manhattan], but that she was turned down because she was 39 years old.

(iv) DO HYUP BAE, also known as "Do Hyeop" ("DO HYEOP")

Washington, D.C.

40. On May 6, 2006, at approximately 11:10 p.m., DO HYEOP asked KIM for help because DO HYEOP was supposed to drive a girl to "Grandma's Place" [brothel] in Washington, D.C. that evening, but the girl had cancelled because she had started her menstrual cycle unexpectedly. DO HYEOP had told the brothel

owner that he would bring a different girl the following day, but DO HYEOP could not find an available girl. KIM said that he would call around to find someone. KIM asked how much girls could make at "Grandma's Place," and DO HYEOP responded that it varied, but the girls were making \$17,000 to \$18,000. KIM stated that he had placed a female known as "Jin Hui" at "Grandma's Place" who had earned more than that.

41. On May 7, 2006, at approximately 1:33 a.m., DO HYEOP called KIM to find out if KIM had located anyone for Grandma's brothel the following day. KIM said he was unable to find a girl. DO HYEOP told KIM that the owner of "Grandma's" would call KIM or CHEOL-I for a girl. DO HYEOP and KIM discussed the fact that it was difficult to find brothels where girls could make good money these days.

42. On May 11, 2006, at approximately 7:22 p.m., DO HYEOP and KIM discussed raising the transportation fee for sex workers from \$50 to \$100 per trip. DO HYEOP told KIM that CHEOL-I opposed raising the transportation fees for sex workers because the girls were not making good money. DO HYEOP asked KIM to talk to CHEOL-I about raising the fees, and KIM agreed that he would do so. DO HYEOP stated that he had started charging the increased fee that day, and would charge \$350 for trips to brothels in Atlantic City and \$300 for trips to brothels in Philadelphia. DO HYEOP had told a Boston-bound sex worker that the fare had increased from \$450 to \$500. DO HYEOP stated that it would cost \$550 to go to Washington, D.C. DO HYEOP and KIM

agreed that the sex workers would not make a big deal out of paying \$50 to \$100 more. DO HYEOP again asked KIM to persuade CHEOL-I about the fare increase; KIM said that he would.

REDACTED

REDACTED

REDACTED

REDACTED

(vii) KYONG POLACHEK, also known as "Ji-Yeon Kim,"
"Jennifer" and "Hana" ("JI-YEON")

Flushing, New York

43. On March 4, 2006, at approximately 8:11 p.m., JI-YEON called KIM and told him that she had opened a brothel. JI-YEON asked KIM to find JI YEON a young, pretty girl for a "fantasy" brothel. JI-YEON told KIM that sex workers at her new brothel usually made \$600 per day on the weekdays and more than \$1000 per day on weekends. JI-YEON expected the number of customers to increase, and expected a lot of support from Manhattan drivers since she had worked in Manhattan [as a sex worker] for a long time. JI-YEON stated that she had agreed with her girls not to charge them for meals and to provide them with a lawyer in case they had problems with law enforcement. KIM agreed that JI-YEON's working conditions were good. KIM asked JI-YEON if he could tell girls that they could make \$20,000 [per month] at JI-YEON's brothel. JI-YEON responded that her brothel was a "choice" brothel so that customers could choose their girls [meaning that some girls may not be chosen as often and would earn less]. At approximately 8:31 p.m. on the same day, KIM called JI-YEON and told her that he would place a girl at JI-YEON's brothel the following day or the day after.

44. On April 25, 2006, at approximately 11:27 p.m., JI-YEON asked KIM if there were any girls available, but KIM responded that there was a shortage of girls. JI-YEON asked KIM if the girls were not working because they were scared, and if there was any area that had been raided. KIM responded that he was just having a hard time providing girls, and that no area in particular had been raided. JI-YEON decided not to advertise for a while, and KIM asked JI-YEON if she had all the girls that she needed. JI-YEON told KIM that she called KIM because she needed more girls. KIM suggested that JI-YEON ask a female sex worker known as "Seon-u." JI-YEON responded that Seon-U had suggested that JI-YEON close the brothel because there had been a raid in Flushing. JI-YEON complained about Seon-U, but stated that Seon-U had a child-like face, so that Korean customers liked her. KIM responded that he would continue to look for girls for JI-YEON.

45. On May 12, 2006, at approximately 12:59 a.m., JI-YEON asked KIM for a girl for her brothel. JI-YEON stated that her brothel provided good income to sex workers, and had a good customer volume even without running many ads. At approximately 4:28 p.m. on the same day, KIM told JI-YEON that girls were not willing to go to JI-YEON's brothel because it was located in Flushing. KIM and JI-YEON wondered why girls avoided working in Flushing. JI-YEON asked him to continue looking for a girl. KIM asked JI-YEON if she would be willing to go to Connecticut to work at a brothel. JI-YEON said she would not go to other locations to work since she now owned her own brothel.

46. On May 14, 2006, at approximately 12:32 a.m., JI-YEON again asked KIM to supply a girl for her brothel on Monday.

Connecticut

47. On April 10, 2006, at approximately 8:56 p.m., JI-YEON told KIM that a female brothel owner known as "Big Sister Kim" needed a girl for her Connecticut brothel, and that KIM should get a pretty, young girl.

48. Physical Surveillance. Physical surveillance of KIM, conducted in conjunction with the wiretap, confirmed KIM's transportation of Korean female sex workers across state lines, as set forth below.

Washington, D.C.

49. On April 28, 2006, at approximately 8:11 p.m., a female known as "Yu-Ri" told KIM that she wanted to go to another state to work. KIM told her there were openings at "Downtown" brothel in Washington, D.C., or at either "Royal" brothels in Philadelphia, Pennsylvania or in Washington, D.C. Yu-Ri told KIM to place her anywhere.

50. On April 29, 2006, at approximately 7:17 p.m., Yu-Ri told KIM that she would not be able to work until Wednesday.

51. On Monday, May 1, 2006, at approximately 5:18 p.m., KIM called Yu-Ri and asked if Yu-Ri could go to "Royal" brothel in Washington, D.C., where only four other girls were working. KIM and Yu-Ri agreed to go to "Royal" on Wednesday evening.

52. On Wednesday, May 3, 2006, at approximately 1:44 p.m., KIM called Yu-Ri and asked if they could leave for the brothel at 6:00 p.m.; Yu-Ri agreed. On May 3, 2006, at approximately 1:46 p.m., a female known as "Tae-eun" called KIM and asked what time KIM could bring a girl that day. KIM responded that he would leave around 6:00 p.m. At approximately 4:55 p.m., CHOI called KIM, who told CHOI that he would be heading to Washington, D.C. shortly.

53. At approximately 6:05 p.m., KIM called Yu-Ri and confirmed that she still lived on 155th Street. KIM told her that he was at a body shop at 154th Street having his oil changed, but would be at her place shortly. Yu-Ri told KIM that she had luggage, and KIM confirmed that he would pick her up very soon.

54. On May 3, 2006, at approximately 6:07 p.m., an agent who was conducting physical surveillance observed KIM leave a body shop located at 152-18A Northern Boulevard, in Flushing [Queens, New York]. KIM drove to the corner of Roosevelt and 155th Street and picked up a female carrying one bag. The bag was placed in the rear of the vehicle, and the female entered the passenger side of KIM's car.

C. The Defendants' Role in Unlicensed Money Transmitting

55. Wiretap Evidence. The KIM Wiretap revealed conversations on a frequent basis between the defendant TAE HOON KIM, also known as "Tae Won" ("KIM"), and various brothel owners, prostitutes, other middlemen and drivers, money transmitters and

others, including BYOUNG IL SON, also known as "Mr. Son," JIN SOOK KIM LEE, MIAE CHOI-SON, and FNU LNU, also known as "Jong Tae," in which KIM negotiated, discussed and arranged for unlicensed money transmitting, or hawala, to Korea, as set forth below.

(i) TAE HOON KIM, also known as "Tae Won" ("KIM")

56. On April 27, 2006, at approximately 11:23 p.m., KIM explained to a female known as "Gyeong-a" how hawala transactions worked. KIM told her that the money was not wired from the United States to an account in Korea, but that a Korean counterpart, an associate of the money transmitter in the United States, would give the money directly to a recipient in Korea. KIM further explained that, if Gyeong-A gave money to KIM for transmitting, KIM would give it to a money transmitter. The money transmitter would call Korea, and the transaction would be completed immediately. KIM explained that the largest amount that Gyeong-A would be able to send would be "1" or "2." KIM stated that large transactions involving \$100,000 or \$200,000 required more verification processes. KIM explained that [unlicensed] money transmitters' exchange rates were lower than the market exchange rate.

57. On March 13, 2006, at approximately 12:57 a.m., KIM told a female known as "Go-eun" that he could help her send money to Korea. KIM explained to Go-Eun that KIM sent money to Korea for sex workers through another individual because KIM would never use Western Union, which required identification.

(ii) BYOUNG IL SON, also known as "Mr. Son" ("SON")

58. On February 26, 2006, at approximately 7:56 p.m., SON called KIM and said that he had started a hawala business. KIM was glad because KIM had seven bills to exchange. KIM asked SON to come to KIM's location, and SON said that he would arrive there in 20 minutes. KIM indicated that he had two separate transactions, one for \$6,000 and one for \$7,000.

59. On February 27, 2006, at approximately 10:01 p.m., KIM asked SON if yesterday's money had gone in without problems. SON responded that it had, otherwise the girls would have complained. SON also asked KIM to tell CHEOL-I that SON was conducting hawala transactions now.

60. On April 12, 2006, at approximately 6:29 p.m., KIM told CHOI that he was doing hawala transactions with SON. KIM told CHOI that KIM would see if SON would do hawala transactions with CHOI. At 6:31 p.m. on the same date, KIM told SON that an individual he knew had \$10,000 to send. SON agreed to do the transaction and told KIM that he (SON) would call him later. At 10:28 p.m., CHOI asked KIM if KIM's hawala line was operational, and KIM responded that he had not yet heard from SON. At 11:14 p.m. on the same day, KIM asked SON if SON would do hawala for another individual if KIM picked up the money and gave it to SON the following day. SON agreed, and KIM responded that he would call SON the following day.

61. On April 13, 2006, at approximately 7:50 p.m., KIM asked CHOI for the bank account number for the hawala

transaction. CHOI provided a bank account number for JAE-IL KOREAN BANK, identified the person as Eun-Hui Kim,^{5/} and stated that the amount was \$10,000. At approximately 8:24 p.m. on the same day, CHOI asked KIM when he could tell the sender that the money had been transferred. KIM responded that the money would be transferred the same day. At 11:08 p.m., KIM told CHOI that the money should have been transferred, and that the exchange rate was 950 [Won per U.S. dollar]. KIM told CHOI to call the sender in thirty minutes and have that person verify the deposit [into the Korean bank account].

(iii) MIAE CHOI-SON and (iv) JIN SOOK KIM LEE
("JIN SOOK")

62. On May 1, 2006, at approximately 12:04 p.m., KIM told SON that because he was going to Philadelphia he would be unable to meet with KIM that day. KIM asked SON to call KIM's wife, JIN SOOK KIM LEE ("JIN SOOK"),^{6/} and arrange to meet with her. At approximately 12:06 p.m., KIM called JIN SOOK and gave her SON's phone number and asked her to call SON to find out where to meet and how to hand over the money. KIM told JIN SOOK that the money for SON was only the money in the plastic bag and not the \$3,000 next to it. KIM called JIN SOOK a few minutes later, and she told him that SON had asked JIN SOOK to give the

^{5/} Based on my knowledge of the investigation, I believe that Eun-Hui Kim is a brothel owner or worker in the United States and the sender, as opposed to the recipient, of the money.

^{6/} Based on documentary evidence, including telephone subscriber information and cable bills, we have determined that KIM's wife is JIN SOOK KIM LEE.

money to SON's wife [MIAE CHOI-SON].^{2/} JIN SOOK said that she and SON's wife decided to meet at Bay Terrace Mall in Flushing [New York]. JIN SOOK said that she would take two bundles of money and the processing fee. At approximately 12:15 p.m., KIM told SON that there were two money bundles, one with 10 bills and the other with 13 bills. KIM told SON to send the 10 bill bundle to the regular place where KIM had been sending money, and added that the other bundle only had an account number without a phone number attached. At approximately 12:59 p.m., JIN SOOK asked KIM for the name of the person to whom she was supposed to give the money, and KIM said that it was SON, but that SON'S wife would take the money. At approximately 1:16 p.m., JIN SOOK told KIM that she had just handed the money over to SON'S wife. At approximately 1:50 p.m., a female known as "Sunny" [a sex worker] called KIM from "Smile" [a brothel in Pennsylvania], and asked KIM if he (KIM) could send \$7,000 or \$8,000 for her. Based on my experience and knowledge of the investigation, I believe that Sunny was asking KIM to conduct a hawala transaction to Korea with money that she had earned as a sex worker. At approximately 5:28 p.m., KIM told SON that he would have another transaction for \$7,000 or \$8,000 later that evening, at around 8:00 or 10:00 p.m. At approximately 5:31 p.m., JIN SOOK called KIM to confirm that she had delivered the correct amount of money to SON. KIM confirmed that she had.

^{2/} The investigation concerning SON confirmed the identity of his wife to be that of MIAE CHOI-SON.

63. On May 3, 2006, at approximately 11:16 p.m., a female known as "Seon-Hui" called KIM to ask what had happened with the money exchange. KIM said that she would have to verify [the deposit] after the close of business.

64. On May 3, 2006, at approximately 12:26 p.m., Sunny called KIM regarding the money transaction she had spoken to KIM about on May 1, 2006, at approximately 1:50 p.m. (see Paragraph 71). KIM told Sunny that he was on his way to pick up the money from an unidentified male, who was delivering it for Sunny [from Smile brothel in Philadelphia] to KIM in Flushing.

65. On May 3, 2006, at approximately 3:01 p.m., KIM called a female known as "Sang-A," who asked KIM if he had sent the money to Korea. KIM advised Sang-A to confirm whether someone in Korea had received the money. At approximately 7:05 p.m., "Sang-A" called KIM and told him that 9.2 million Korean Won [equivalent to more than \$9,000] had been deposited two days earlier. Sang-A had not verified whether the other sex worker's money had been successfully sent.

66. Based on my experience and knowledge of the investigation, I believe that the two bundles of money delivered by KIM through his wife, JIN SOOK, to SON through his wife, MAIE CHOI-SON, on May 1st were proceeds from prostitution being sent by Sang-A and another sex worker from the United States to Korea.

(v) FNU LNU, also known as "Jong Tae" ("JONG TAE")

67. On May 12, 2006, at approximately 1:00 p.m., JONG TAE told KIM that JONG TAE used to assist in the money

transmitting business of a Korean money transmitter (the "Money Transmitter") and that JONG TAE would give the Money Transmitter \$100 and keep \$200 for himself for every \$10,000 that was transmitted. JONG TAE told KIM that the Money Transmitter wanted to be introduced to someone else that would bring him hawala business. JONG TAE told KIM that he wanted to introduce the Money Transmitter to KIM. KIM agreed that giving the money directly to a Korean recipient would be better than sending the money through a bank because Korean authorities started cracking down on illegal money exchange transactions involving banks. JONG TAE stated that many people were caught, and that the Money Transmitter would no longer do transactions through banks. KIM told JONG TAE to give KIM's phone number to the Money Transmitter so that he could call KIM, since KIM engaged in money exchanges because he traveled to different brothel locations. JONG TAE told KIM that the Money Transmitter was willing to go to Flushing daily for money exchange meetings with KIM. JONG TAE told KIM that, if the Money Transmitter received \$100 for every \$10,000 transaction, then JONG TAE would also receive some payment. JONG TAE confirmed that KIM would pay one percent as a fee to the Money Transmitter for every \$10,000 exchanged. JONG TAE told KIM that the Money Transmitter used to give him \$50 if JONG TAE was the middleman for a hawala transaction between the Money Transmitter and other drivers. JONG TAE told KIM that JONG TAE dealt with the Money Transmitter because he gave a better deal than other money transmitters. KIM asked JONG TAE if any amount

would be acceptable to exchange, and JONG TAE responded that \$2,000 or \$3,000 was too small for the Money Transmitter to go to Flushing. KIM said that he would call the Money Transmitter for money exchanges over \$5,000. KIM told JONG TAE to have the Money Transmitter call him.

68. On May 12, 2006, at approximately 1:16 p.m., JONG TAE told KIM that the Money Transmitter would call KIM. JONG TAE told KIM that the Money Transmitter would collect money from KIM and that the Money Transmitter's associate would deliver the money to the recipient in Korea at the same time.

69. On May 12, 2006, at approximately 1:20 p.m., the Money Transmitter called KIM and confirmed that he only did direct exchanges and would not use a bank. KIM and the Money Transmitter discussed fees, minimum transfer amounts, the immediacy of transfer, the reliability of the method, and how to handle recipients outside of Seoul, Korea. KIM told the Money Transmitter that some weeks, KIM sends tens of thousands of dollars. KIM told the Money Transmitter that, during the current week, he had sent between \$20,000 and \$30,000.

70. On May 18, 2006, at approximately 4:50 p.m., JONG TAE asked KIM if he had met with the Money Transmitter yet. KIM told JONG TAE that KIM had only spoken with him on the phone, but had not yet used him for hawala transactions.

71. Department of Treasury, Financial Crimes Enforcement Network ("FINCEN"): A search of the FINCEN database

reveals that KIM, SON, and MIAE CHOI-SON are not licensed money transmitters.

C. Violation of Pre-Sentence Bail Conditions by BYOUNG IL SON, also known as "Mr. Son" ("SON")

72. On May 25, 2005, SON was arrested, pursuant to an arrest warrant issued in this District, on a charge of conducting an illegal money transmitting business, in violation of Title 18, United States Code, Section 1960(a). On May 31, 2005, SON was released on bail after signing an order which set forth conditions for his release. Included among the conditions was that SON "not commit any federal, state, or local crime." See "Order Setting Conditions of Release and Bond" at 2, which is attached hereto.

73. On May 31, 2006, SON pleaded guilty to conducting and managing an illegal money transmitting business, in violation of Title 18, United States Code, Section 1960(a). Following his guilty plea, the conditions of bail previously ordered on May 31, 2005 were continued. Based upon the facts set forth above, there is probable cause to believe that SON committed a federal violation while on release, to wit, conducting and managing an illegal money transmitting business, in violation of the conditions of his release set by the court, pursuant to Title 18, United States Code, Section 3148.

WHEREFORE, your affiant respectfully requests that arrest warrants be issued for TAE HOON KIM, also known as "Tae Won," SUNG CHUL IL, also known as "Seong-Cheol" and "Cheol-I,"

FNU LNU, also known as "Seong Ho," TAE JUN PARK, also known as "Tae Ho Choi," DO HYUP BAE, also known as "Do Hyeop," **REDACTED**

KYONG POLACHEK, also known as "Ji-Yeon Kim," "Jennifer" and "Hana," BYOUNG IL SON, also known as "Mr. Son," JIN SOOK KIM LEE, MIAE CHOI-SON, and FNU LNU, also known as "Jong Tae," so that they may be dealt with according to law, and that this Affidavit and the arrest warrants be filed under seal to prevent the flight of the defendants and other subjects of the investigation and the destruction of evidence.

WON YOON
Special Agent
Federal Bureau of Investigation

Sworn to before me this
14th day of August, 2006

United States Magistrate Judge
Eastern District of New York

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